

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 JAWANZA SMITH, CARLO)
5 BURNEY, BRIAN WYNN,)
6 CARLON LEWIS and)
7 STANLEY HILL,)

8 Plaintiff,)

9 vs.)

10 IDEAL TOWING, LLC,)
11 MICHAEL JAMES and)
12 TISHJA JAMES,)

13 Defendants.)
14 _____)

CIVIL ACTION FILE
NO. 1:16-cv-01359-TWT

15 DEPOSITION OF

16 CARLON LEWIS

17 May 4, 2017

18 10:00 a.m.

19 101 Marietta Street
20 3100 Centennial Tower
21 Atlanta, Georgia

22 Lamarra George, CCR-2582
23
24
25

APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

JAWANZA SMITH, CARLO BURNEY, BRIAN WYNN,
CARLON LEWIS and STANLEY HILL

MITCHELL D. BENJAMIN, ESQ.

Delong Caldwell Bridgers Fitzpatrick & Benjamin
3100 Centennial Tower
101 Marietta Street, N.W.
Atlanta, Georgia 30303
770-859-0754
Benjamin@dcbflegal.com

On behalf of the Defendant:

IDEAL TOWING, LLC, MICHAEL JAMES and
TISHJA JAMES

JORDAN M. MAHONEY, ESQ.

The Burke Law Group, LLC
199 Peters Street, NW
Suite A
Atlanta, Georgia 303013
404-688-1210
Eburke@burkelawatl.com
Jordan.mahoney@burkelawatl.com

Also Present:

Tishja James

INDEX TO EXAMINATIONS

<u>Examination</u>	<u>Page</u>
Examination by Mr. Mahoney	7
Examination by Mr. Benjamin	103
Examination by Mr. Mahoney	107
Examination by Mr. Benjamin	116
Examination by Mr. Mahoney	116

INDEX TO EXHIBITS

<u>Exhibit</u>	<u>Description</u>	<u>Page</u>
1	Ideal Towing, LLC Independent Contractor Agreement signed by Carlon Lewis	86
2	Ideal Towing, LLC Employment Application signed by Carlon Lewis	89
3	Copy of a 2014 1099 from Ideal Towing, LLC for Carlon Lewis	95
4	Copy of a 2015 1099 from Ideal Towing, LLC for Carlon Lewis	96
5	Copy of a document titled Contracted Driver Mandatory Tools	98

(Exhibits 1 through 5 have been attached to the original transcript.)

1 CARLON LEWIS,
2 having been first duly sworn, was examined and
3 testified as follows:

4 MR. MAHONEY: Can you please state
5 your full name for the record.

6 THE WITNESS: Carlon Lopez Lewis.

7 MR. MAHONEY: Good morning. My name
8 is Jordan Mahoney. I'm an attorney for the
9 defendants in this matter.

10 Have you ever taken a deposition
11 before?

12 THE WITNESS: No.

13 MR. MAHONEY: Have you ever been a
14 witness or given testimony in a formal
15 legal proceeding?

16 THE WITNESS: No.

17 MR. BENJAMIN: Jordan, did you want
18 to abide by the same stipulations that we
19 had in affect for the other depositions in
20 this case?

21 MR. MAHONEY: Yes.

22 MR. BENJAMIN:

23 MR. MAHONEY: Yes. Mr. Benjamin, do
24 we agree to reserve all objections, other
25 than form and responsiveness of the witness

1 until first use?

2 MR. BENJAMIN: And the application
3 of privilege, yes.

4 MR. MAHONEY: And have you had a
5 chance to speak with your client about
6 signature?

7 MR. BENJAMIN: We will reserve. We
8 haven't -- off the record for a moment.

9 (Whereupon, a brief discussion was
10 held off the record.)

11 MR. MAHONEY: Now, Mr. Lewis, are
12 you under any medications or under the
13 influence of any substances that may affect
14 your ability to testify honestly and
15 truthfully this morning?

16 THE WITNESS: No.

17 MR. MAHONEY: Do you typically use
18 any medications on a daily basis?

19 THE WITNESS: No.

20 MR. MAHONEY: All right. I'd like
21 to go over a few ground rules to help the
22 deposition go smoothly and efficiently.

23 Ms. George is here and she's taking
24 down everything that we say. So it's very
25 important that we verbalize our responses,

1 yeses and noes rather shaking our head and
2 nodding our head. Even though that's
3 regular in conversation, it's very hard for
4 her to take those types of responses down.

5 THE WITNESS: Yes.

6 MR. MAHONEY: Also, I will try to
7 let you finish your entire answer before I
8 begin my next question. That will stop us
9 from talking over each other. It's very
10 hard to take down two people talking at the
11 same time.

12 THE WITNESS: Yes.

13 MR. MAHONEY: I also request that
14 you do the same for me, allow me to finish
15 my entire question before you begin
16 answering.

17 If you need a break at any time,
18 please let me know. I'll be happy to let
19 to you do that. Also, if you have any
20 trouble hearing me or I'm speaking too
21 softly, please let me know.

22 EXAMINATION

23 BY MR. MAHONEY:

24 Q When did you learn about this deposition?

25 A When I was e-mailed.

1 Q When were you e-mailed?

2 A Last week. Well, hold on. Week before.

3 Week before.

4 Q From when you learned about the deposition
5 until now, did you review any documents to help you
6 this morning?

7 A No.

8 Q Did you speak with anyone other than your
9 attorney --

10 A No.

11 Q -- about the facts of this case?

12 A I'm sorry. No.

13 Q That's fine.

14 Now, I want to be very clear, and that's
15 not just for right now, but for the entirety of our
16 deposition, I don't want you to go into any specifics
17 of what you discussed with your attorneys, because
18 that's privileged.

19 A Okay.

20 Q Do you have any prior arrests?

21 A Yes. One.

22 Q When?

23 A April 2001.

24 Q For what?

25 A Loitering.

1 Q Did you say loitering?

2 A Yes.

3 Q Were you convicted?

4 A No.

5 Q Was it dismissed?

6 A Yes.

7 Q Where did that occur?

8 A DeKalb County, Decatur, Georgia.

9 Q Where do you currently reside?

10 A DeKalb County, Decatur, Georgia.

11 Q Can you give me your full address?

12 A 3841 Kensington Road, Decatur, Georgia,
13 30032.

14 Q How long have you lived there?

15 A Four years.

16 Q Who lives in that residence with you?

17 A My fiance' and three of my kids.

18 Q I'm going to ask you the names of some of
19 your family members. I'm doing that for the sole
20 purpose of finding out if there's anyone on the jury
21 that has relation to you so we can prevent them from
22 being on the jury in the trial of your matter.

23 What's the name of your fiance?

24 A Sheila Johnson.

25 Q What are the names and ages of your

1 children?

2 A Caron Lewis, 12. You mean the kids that
3 stay in my house with me?

4 Q Yes, sir.

5 A Okay. Yeah, Caron Lewis, 12; Shakaria
6 Lewis, 7; Camille Lewis, 6.

7 Q Do you have any other family members that
8 lives in the Atlanta metro area?

9 A My whole family.

10 Q I'm going to have to ask you to name them.

11 A My whole family? We'll be here for days.

12 Q How many family members do you believe you
13 have in the Atlanta metro area?

14 MR. BENJAMIN: That are over 18 that
15 could be on the jury?

16 Q (By Mr. Mahoney) That are ove -- yeah,
17 let's try to do --

18 A That are over 18 on the jury, hundreds.
19 Seriously. My family's big. My mom's like --

20 Q Can you tell me the -- I'm sorry. Can you
21 tell me the last names?

22 A Okay. I can do that. I got the Hearse
23 Dennis, that's my mom's maiden name. Lewis,
24 Whiteheads, Halls, McBrides, Summerhouse, Cannon.
25 That's far as -- some of I can think of. Some of

1 them I don't even know their last names. They're
2 married and stuff.

3 Q The ones you can't remember their last
4 names, can you tell me their first names?

5 A Well, those -- I don't think they're 18
6 yet.

7 Q All right. Have you ever been a party to
8 a lawsuit before?

9 A No.

10 Q What educational degrees have you
11 received?

12 A I only have a -- it's a -- I got a
13 diploma.

14 Q A high school diploma?

15 A Yes.

16 Q It's not a GED?

17 A No. Full diploma. Certificates from
18 college.

19 Q More than one?

20 A Yes.

21 Q What certificates do you have?

22 A Brakes, climate control, electrical,
23 automotive division.

24 Q And where did you receive your diploma?

25 A DeKalb Technical College.

1 Q Your high school diploma?

2 A Oh, my school diploma. I'm sorry.

3 Avondale High School.

4 Q And where --

5 A Slash -- I'm sorry. Slash open campus. I
6 had to go there for a second. So it should -- might
7 have both of them.

8 Q And where did you receive each
9 certificate?

10 A DeKalb Technical College.

11 Q They offer classes on brakes?

12 A Huh?

13 Q They offer classes on brakes?

14 A Yes.

15 Q Automotive?

16 A Yeah. That's the automotive division, the
17 brakes, climate control and electrical automotive
18 division. So each one is different classes for that
19 program.

20 Q Do you have any other professional or
21 vocational training other than that?

22 A No.

23 Q Did you receive training at any of your
24 past employers?

25 MR. BENJAMIN: School training or on

1 the job?

2 Q (By Mr. Mahoney) On-the -job training at
3 employers.

4 A I mean, of course.

5 Q What was your first job after high school?

6 A After high school?

7 Q Yes.

8 A I started working during high school.

9 Q During high school.

10 A Mrs. Winners.

11 Q What years did you work there?

12 A '97 to '98.

13 Q When did you graduate from high school by
14 the way?

15 A 2001.

16 Q And when did you graduate from DeKalb
17 Technical Institute?

18 MR. BENJAMIN: Objection to form.

19 Q (By Mr. Mahoney) DeKalb Technical College.

20 MR. BENJAMIN: I don't think he said
21 he graduated. He said he got certificates.

22 THE WITNESS: Yeah, I didn't
23 graduate, but --

24 MR. MAHONEY: Okay.

25 THE WITNESS: -- that's my plan.

1 MR. MAHONEY: That's fine.

2 Q (By Mr. Mahoney) So what years did you
3 attend Avondale High School?

4 A Avondale High School?

5 Q Yes.

6 A '94 to '99.

7 Q And what year did you receive your
8 diploma?

9 A 2001.

10 Q And what years did you attend DeKalb
11 Technical College?

12 A From '04 to '05.

13 Q And what year --

14 A 2004 to 2005. I'm sorry.

15 Q And what year did you receive your
16 certificates?

17 A 2004 and 2005.

18 Q What were your duties at Mrs. Winners?

19 A Cashier, cook, drivethrough.

20 Q What were your hours?

21 A After school hours from, like, 5 to 10.

22 Q Were you paid hourly?

23 A Yes.

24 Q What was your rate?

25 A Seven fifteen. Hold on. No, no, no, no.

1 Five fifteen. I'm sorry. That's about 20 -- 20 --
2 30 years ago. Yeah, five fifteen.

3 Q And do you consider that a wage?

4 A Do I consider that a wage?

5 Q A wage.

6 A Five fifteen an hour, that was my hourly
7 wage.

8 Q What was your reason for leaving?

9 A It was just a high school job for prom. I
10 was in 11th grade.

11 Q Did you have to punch a clock?

12 A Yes.

13 Q Were you allowed to leave?

14 A Allowed to leave, yes. On my freewill,
15 yes.

16 Q After you punched the clock?

17 A Well, no. When I punched the clock, I had
18 to do my job.

19 Q What was your next job?

20 A Folks Southern Kitchen.

21 Q And when did you work there?

22 A Like 2001, 2002.

23 Q Why did you decide to work there?

24 A I wanted to try to move out. My brother
25 worked there.

1 Q What were your duties?

2 A Fry cook, fried the chicken. I was the
3 fry line cook exactly. I'm sorry.

4 Q What were your hours?

5 MR. BENJAMIN: If you remember. I
6 don't want you speculating.

7 THE WITNESS: Okay. Like, 1 to 10,
8 open to close. Open two to three,
9 something. My brother was the manager, so
10 I went in with him.

11 Q (By Mr. Mahoney) And were you paid by the
12 hour?

13 A Yes.

14 Q How much?

15 A I can't remember.

16 Q What was your reason for leaving?

17 A Better job offer.

18 Q Did you punch a clock?

19 A Yes.

20 Q Once you punched the clock, were you
21 allowed to leave?

22 A No.

23 Q What was your next job?

24 A Auto Zone.

25 Q When did you work there?

1 A 2001 to 2002.

2 Q At the same time you were working at Folks
3 Southern Kitchen?

4 A Yeah. No, it's not the same time. I
5 worked at Folks Southern Kitchen when I was getting
6 my -- graduating high school. So right after I
7 graduated high school, got ready to go to college
8 that I knew I wanted to go to automotive, so I jumped
9 into Auto Zone to get me ready for my field before I
10 went to DeKalb Tech.

11 Q All right. Earlier you testified that you
12 worked at Folks Southern Kitchen 2001 and 2002. So
13 when did you start at Auto Zone?

14 A The end of two thousand -- 2001. I did it
15 -- like, worked both of them for a second, then I
16 stopped.

17 Q All right. Did you receive any training
18 there?

19 A Auto Zone?

20 Q Yes.

21 A Customer service, parts lookup, warehouse,
22 parts pulling.

23 Q Were those your duties?

24 A Yes.

25 Q What were your hours?

1 A 6 to 2, 8 to 5, 8 to 3. Different hours.
2 It varied.

3 Q And were you paid hourly?

4 A Yes.

5 Q What was your wage?

6 A Seven fifty.

7 Q Did you punch a clock?

8 A Yes.

9 Q Were you allowed to leave?

10 A No.

11 Q Why did you leave?

12 A I got -- I went to DeKalb Tech. First, I
13 -- I started working with my grandfather doing
14 construction, pouring concrete.

15 Q All right. So that -- was that your next
16 job?

17 A Yes.

18 Q What was the name of the company?

19 A It was my own -- my granddaddy owned a
20 private company. He's deceased, I mean.

21 Q I understand.

22 A Dennis Construction.

23 Q Dennis?

24 A Yeah.

25 Q And what were your duties there?

1 A Laborer, finisher.

2 Q Were you hourly?

3 A No.

4 Q Were you daily?

5 A Yes.

6 Q Were you paid a daily wage?

7 A Yes.

8 Q What was the amount?

9 A 125. \$125 a day.

10 Q Did you have to punch a clock?

11 A No.

12 Q You just had to show up that day?

13 A Yeah.

14 Q Were you allowed to leave the site?

15 A For lunch or to get supplies.

16 Q What was your next job?

17 A I went to school after that.

18 Q And what was your next job?

19 A My next job, a tow -- well, hold on. No,

20 I did security at CVS, armed security.

21 Q And when did you work there?

22 A '05 to beginning of '06.

23 Q And when did you work at Dennis

24 Construction by the way?

25 A When did I work at Dennis Construction?

1 Q Yes.

2 A 2003 to 2005 on and off. Because it was
3 my grandfather, so whenever he needed help.

4 Q Were you hourly at CVS?

5 A Yes.

6 Q What were yours hours?

7 A 7 to 4, 2 to 10.

8 Q 7 p.m. or 7 a.m.?

9 A 7 a.m. Yeah, it varied. I did mornings
10 and sometimes did night.

11 Q So it was 7 a.m. and 4 p.m. and then what?

12 A 2 to 10.

13 Q p.m. to p.m.?

14 A Yeah, 2 p.m. to 10 p.m.

15 Q How much were you paid per hour?

16 A \$13 an hour.

17 Q What were your duties?

18 A Protect the customers, watch over the
19 premises, keep down the theft, chase shoplifters and
20 bring them back in, work with APD.

21 Q Did you punch a clock?

22 A Yes -- no. No.

23 Q What was your routine when you came into
24 work?

25 A Came in, looked around, made sure it's all

1 going on, make sure everything smooth, make sure the
2 money is transported where it's supposed to be and
3 nobody is casing the place.

4 Q Did you have to sign in?

5 A No, I called in.

6 Q Who did you call?

7 A My supervisor.

8 Q Every morning?

9 A Every morning or every afternoon, and
10 every night when I would -- and every afternoon when
11 I clock out.

12 Q After you called your supervisor, were you
13 permitted to leave?

14 A No.

15 MR. BENJAMIN: You mean when he was
16 just arriving or when he was leaving for
17 the day?

18 Q (By Mr. Mahoney) Between the times when
19 you would clock in and clock out --

20 A During a shift?

21 Q Yes.

22 A No.

23 Q What was your next job?

24 A A Tow.

25 Q And when did you work there?

1 A '06 to '07.

2 Q Why did you leave CVS?

3 A Because A Tow was part of my field,
4 dealing with cars.

5 Q How were you compensated at A Tow?

6 A Commission.

7 Q How much?

8 A 26 percent.

9 Q Did you punch a clock?

10 A Yes.

11 Q Were you permitted to leave
12 the premises after you punched the clock?

13 A Of course. I had to drive the truck.

14 Q Did you have a designated area?

15 A Yes.

16 Q What was your designated area?

17 A Zone 5, which is downtown, APD precinct.
18 Yeah, basically that's where we was until we were
19 dispatch dispatched somewhere else, which they -- A
20 Tow had two lots. The other was Alpharetta. So we
21 did police contracts plus roadside, impound.

22 Q So you worked with the police department?

23 A APD Zone 5, North and South Fulton Police
24 Department, Georgia State Patrol, Atlanta area
25 University Colleges. That's about it. And, I

1 mean -- and the Department of Public Safety, DPS.

2 Q Where did you live at the time?

3 A Stone Mountain. The exact address?

4 Q That's fine. Why did you leave?

5 A Leave what?

6 Q Why did you leave that company?

7 A Why did I leave A Tow?

8 Q Yes.

9 A My grandfather was getting sick, and so I
10 needed to go help him with his company.

11 Q Is this the same grandfather --

12 A Yes.

13 Q -- that owned Dennis Construction?

14 A I'm sorry.

15 MR. BENJAMIN: You have to let him
16 finish.

17 THE WITNESS: I'm sorry.

18 MR. MAHONEY: It's fine. It's
19 normal conversation. We all do it.

20 Q (By Mr. Mahoney) Is that the same grand
21 father that owned Dennis Construction?

22 A Yes.

23 Q Why did you leave Dennis Construction in
24 2005?

25 A Never exactly left, but, you know, it was

1 times to do some of my own things.

2 Q So what was your next job, back at Dennis
3 Construction?

4 A Stayed at Dennis Construction. I started
5 my next towing job two thousand and -- 2009.

6 Q Why did you want to be in the tow
7 business?

8 A I love towing.

9 Q Do you consider that your occupation?

10 A Yes. I consider that my career.

11 Q Have you ever advertised yourself as A Tow
12 driver?

13 A A Tow driver --

14 MR. BENJAMIN: Object to form.

15 THE WITNESS: What do you mean?

16 Q (By Mr. Mahoney) On social media or to
17 friends.

18 A Like ad -- no.

19 MR. BENJAMIN: Object to form.

20 THE WITNESS: No, not on social
21 media, but everybody know I drive a tow
22 truck, so I don't advertise that.

23 Q (By Mr. Mahoney) How does everyone know?

24 A Because everybody know what I do. I mean,
25 but I don't advertise that. I don't put myself out

1 there for sale, not for hire.

2 Q But how did they find out that you --
3 that's what you do?

4 A Of course they see my driving a truck. So
5 they see me driving a truck, you know, hey, oh,
6 that's what you do, yeah, that's what I do.

7 Q Do you have any social media accounts?

8 A Facebook.

9 Q Do you have a Twitter?

10 A No.

11 Q Do you have an Instagram?

12 A No.

13 Q Snapchat?

14 A No.

15 Q Is that past your time?

16 A Tell you the truth, man, I don't even
17 worry about that stuff. I don't even watch TV like
18 that, to be honest.

19 Q There's not much to watch on TV?

20 A No. Just repeats. I got kids. I might
21 sit down and watch a couple of cartoons with them.
22 That's it.

23 Q Do you list your occupation on your
24 Facebook?

25 A I don't think so. I haven't been on

1 Facebook probably about -- I just get on there and
2 look at somebody's and get off. I -- It be weeks at
3 a time.

4 Q When is the last time you did that?

5 A Probably about three days ago for about
6 like two minutes.

7 Q Do you have any pictures on your profile?

8 A Pictures on my profile?

9 Q Yes.

10 A Yes.

11 Q Of yourself?

12 A Me and my son.

13 Q Do you have any pictures with you wearing
14 a towing uniform?

15 A Wearing a towing uniform?

16 Q Yes.

17 A Probably so.

18 Q How about with a tow truck in a picture?

19 A Just a tow truck, yeah. Not just a tow
20 truck, but I'm saying yeah because --

21 Q Right. What else --

22 A If -- if a customer was like hey, man, you
23 know, you towing an antique, do you want to take a
24 picture with me. Well, sure, I guess.

25 Q Do you have a LinkedIn profile?

1 A LinkedIn? What you mean?

2 Q It's a social media website?

3 A I don't know what that is.

4 Q Do you have any career profiles online?

5 MR. BENJAMIN: Objection to form.

6 THE WITNESS: Not that I know of. I

7 don't be on social media like that, Man,

8 so, yeah, I mean --

9 Q (By Mr. Mahoney) Me either.

10 A I ain't got time for it.

11 Q So what tow business did you start working
12 for in 2009?

13 A Auto Access.

14 Q How did you learn about that job?

15 A Driving past, stopped in, seen tow trucks
16 in the driveway.

17 Q Who was your manager at Auto Access
18 Towing?

19 A Robert Glover.

20 Q Who was your manager at A Tow?

21 A A couple of managers. It's a family
22 business. Paige Porter and David Porter.

23 Q Who owned Auto Access Towing?

24 A Well, I guess, Robert Glover, and him and
25 his brother, Ed Glover.

1 Q And how long did you stay at Auto Access
2 Towing?

3 A About a year and a half, almost about two
4 years.

5 Q What year did you leave?

6 A I left like -- like two thousand -- end of
7 2010, right before 2011. Yeah, that's right.

8 Q And how were you compensated there?

9 A Commission.

10 Q How much?

11 A Like 28 percent.

12 Q And what kind of customers did you serve
13 there?

14 A Like insurance car breakdowns, roadside.

15 Q Do you know any insurance companies that
16 you were servicing?

17 A It's like Allstate, State Farm, Cross
18 Country, USAA.

19 Q Did you ever do work for private
20 individuals while at Auto Access?

21 A If the boss asked me.

22 Q How about at A Tow?

23 A If the boss asked me.

24 Q Did you punch a clock at Auto Access?

25 A No. That's private owned.

1 Q You said it's private owned?

2 A Like family. You just, I'm here. And
3 then most of the time, I kept my truck.

4 Q What about at A Tow, were you allowed to
5 keep the truck at A Tow?

6 A No. Only if they had told me to, which
7 was about once, maybe twice, if I had to work late.

8 Q And did you punch a clock?

9 A Yes.

10 Q What were your hours?

11 A Seven to seven.

12 Q a.m. or p.m.?

13 A a.m. to p.m.

14 Q Why did you leave Auto Access?

15 A A better opportunity. My -- started
16 working with J&J Towing.

17 Q What years did you work at J&J?

18 A I want to say 2010 to like 2013.

19 Q How were you compensated there?

20 A I was paid.

21 Q You were paid a wage?

22 A Yeah, you can call it wage. It's
23 basically the -- it was my niece step daddy, I helped
24 him. I'll say about a hundred dollars a day just to
25 look out for him.

1 Q Did they provide you with a truck?

2 A Yes.

3 Q Did you have to be there at a certain
4 time?

5 A No.

6 Q Were you on call?

7 A Basically.

8 Q Who would call you?

9 A The owner of the truck.

10 Q How many -- what's the maximum amount of
11 tows you did in a day for J&J?

12 A About five, six.

13 Q Were you still paid a hundred dollars on
14 those days?

15 A Just to look out for him. Man, I wasn't
16 trying -- he just told me he'd throw me something.
17 And I was really teaching him how to drive -- how to
18 operate his truck.

19 Q What was his name?

20 A John Arnold.

21 Q So he'd ride with you?

22 A Yeah. I mean, yes. I'm sorry. I said
23 "yeah." I meant "yes."

24 Q Did you show him how to do anything else
25 automotive?

1 A No. Basically he showed me. He was a
2 mechanic.

3 Q What did he show you?

4 A Whatever I don't know on fixing a car,
5 whatever I missed or whatever I don't like to do.

6 Q Can you name some examples?

7 A Yeah. I hate drum brakes.

8 Q Anything else?

9 A (Witness nods head.)

10 MR. BENJAMIN: You have to give a
11 verbal response.

12 THE WITNESS: No. Sorry.

13 Q (By Mr. Mahoney) What was your next job?

14 A Ideal Towing.

15 Q Why did you leave J&J?

16 A Because mission accomplished. He know how
17 to run his truck, and then he eventually sold it.
18 So, I guess the company sold out, whatever, went out
19 of business.

20 Q And what years did you work at Ideal
21 Towing?

22 A 2014 to 2015.

23 Q What month did you start in 2014?

24 A In Mar -- April, March. Sometime like
25 that.

1 Q In what month did you leave?

2 A February 2015.

3 Q What were your duties at Ideal Towing?

4 A Roadside, operating tow truck, everything
5 that comes with roadside, jump off, lockouts.

6 Q Would you call that light service?

7 A Both, yeah. I mean, but I wasn't the
8 light service dude there. Light service is a
9 different side.

10 Q Where did you work after Ideal Towing?

11 A Toys R' Us.

12 Q And what -- when did you work there?

13 A Two thousand -- I started November 2015.
14 Yeah, November 2015 to March 2016.

15 Q And then where?

16 A I started working for Jobs 1 Security at
17 Top Golf Midtown.

18 Q What's the name of the security company?

19 A Jobs 1. That's numeric one.

20 Q And when did you work there?

21 A March 2016 to, I'll say, June 2016.

22 Q And where did you work after that?

23 A Right back at towing.

24 Q At what company?

25 A Bravo.

1 Q What years did you work there?

2 A 2016.

3 Q Do you know when you started?

4 A June 2016.

5 Q And what year did you end?

6 A November 2016.

7 Q And why did you leave?

8 A Better job opportunity, and my mom passed.

9 Q What were your hours at Bravo Towing?

10 A 11 to 11.

11 Q a.m. or p.m.?

12 A a.m. to p.m.

13 MR. BENJAMIN: Do you want to take a
14 short break or are you okay?

15 THE WITNESS: I'm okay.

16 Q (By Mr. Mahoney) How were you compensated?

17 A 30 percent. Then I got a raise a couple
18 of months after to 35.

19 Q And what were your duties?

20 A Roadside AAA.

21 Q Light service and towing?

22 A Some, yeah. Basically, light towing.

23 Q Did you punch a clock?

24 A Yes.

25 Q Did you have a designated area?

1 A Northeast, northwest, north Atlanta,
2 downtown Decatur.

3 Q Did you have any down time between your
4 tow jobs?

5 A I guess in between calls maybe, or maybe a
6 couple of minutes if you get that, if you're lucky.
7 If you're not backed up or a lot of breakdowns. It
8 varies.

9 Q And did you park the truck during your
10 down time?

11 A Up under a shade tree where I get some
12 sleep, I guess. Or just to cool off until I get my
13 next call or just put it in park wherever you at.

14 Q What about at A Tow?

15 A Huh?

16 Q Did you have down time between jobs?

17 A Just like a few min -- a couple of minutes
18 in between calls that you might be lucky to get if
19 it's not another call. Can't really say.

20 Q At A Tow, between jobs, did you park the
21 truck?

22 A Not like -- park the truck how? Like...

23 Q What did you do between tow jobs at A Tow?

24 A Step out, stretch my legs.

25 Q Were you required to return to the parking

1 lot?

2 MR. BENJAMIN: Between jobs or at
3 the end of the day?

4 Q (By Mr. Mahoney) Between jobs.

5 A Which parking lot?

6 Q A Tow's.

7 A Yeah, because I had to come back to bring
8 their truck back.

9 Q Between jobs?

10 A Between jobs, no, except for when I'm
11 bringing it to impound.

12 Q Explain that.

13 A We had police contracts. So whenever the
14 police impound the car, we come and get it and we
15 take it to the lot.

16 Q When you started working at A Tow, did you
17 understand the difference between being paid hourly
18 and being paid a commission?

19 A A Tow is my first time ever being paid
20 commission.

21 Q Did you understand the difference whether
22 you started working for auto accidents in 2009?

23 A Yeah, at the time I did the job.

24 Q What was your reason for leaving Ideal
25 Towing?

1 A I was switched over to the other company.

2 Q At Ideal Towing, were you ever given
3 business cards?

4 A Theirs. My name wasn't on them, but it
5 was a spot that say, I'm your driver, Carl, that
6 serviced you or something, or whoever your name is,
7 you just write it in.

8 Q So there was a blank space for your name?

9 A Yeah. So if they want to call and give
10 you, I guess, good comments or whatever.

11 Q Was there any other space for you to fill
12 in other of your personal information?

13 A I don't know. I doubt.

14 Q Did it have the company's phone number on
15 it?

16 A The company's phone number? Yes.

17 Q Did it have the company's address on it?

18 A I guess, yes.

19 MR. BENJAMIN: Don't speculate.

20 THE WITNESS: I mean --

21 MR. BENJAMIN: If you know, answer

22 --

23 THE WITNESS: I don't recall.

24 Q (By Mr. Mahoney) You don't know if it had
25 the address on it?

1 A No. I don't -- I don't know.

2 Q How long have you been A TOW truck driver,
3 total?

4 A I started in 2006 all the way 'till now.

5 Q So how many years?

6 A 11.

7 Q When you started working for Auto Access,
8 did you have all the skills you needed to perform tow
9 truck services?

10 A Yes.

11 Q What did those skills consist of?

12 A Operating a truck, road --

13 Q What does op -- I'm sorry. Finish.

14 A Yeah, operating a truck, roadside,
15 driving.

16 Q Does driving a tow truck require a
17 different level of skill than driving a regular
18 truck?

19 MR. BENJAMIN: Objection to form.

20 THE WITNESS: Yeah.

21 Q (By Mr. Mahoney) Explain.

22 A I guess, yeah, if you're not on the brakes
23 right, you're going to have an accident or if you
24 miscalculate turns. Yeah. It's not like driving a
25 regular car.

1 Q What's the process that goes into loading
2 a car onto a tow truck, from start to finish?

3 A View your surroundings, check out your
4 car, check out the damages, let the bed down all the
5 way to the ground, hook the car up, put it onto the
6 bed, strap it down, put your bed back up, make sure
7 everything is tight before you pull off. Also, put a
8 safety chain on.

9 Q About how long does it take to do that
10 process?

11 A Depends on the situation. 5 to 10
12 minutes.

13 Q What can make it take more than 10
14 minutes?

15 A Car not sitting at a little angle that you
16 can just back straight up to it, or car's down in a
17 ditch and you got to work it out, or a car be upside
18 down and you got to roll it back over.

19 Q How do you work a car out of a ditch?

20 A Winching.

21 Q Does it require any tools to do that?

22 A Chains, J-Hooks, and your cable, and the
23 power of the truck.

24 Q Can you describe the process of doing
25 that?

1 A Yeah. Take your D chain, release the
2 winch, pull your rope all the way to the car. Which
3 process you won't? The rollover or just to pull out
4 the ditch?

5 Q Both. First start with pulling out the
6 ditch.

7 A Car just sitting up, you just hook up to
8 the frame holes and let the winch pull it on out.

9 Q Are the frame holes on the same place on
10 different types of vehicles?

11 A Now you got some cars that don't got them.

12 Q What do you do in that situation?

13 A You use the tow hooks, you use the tow --
14 your tow bar that goes with that car that you screw
15 on the bumper. Most of the time those are the luxury
16 vehicles.

17 Q Do luxury vehicles sometimes take a longer
18 time to tow -- I mean, to hook up to the tow truck
19 than 10 minutes?

20 A I mean, if you want to be safe, yeah. Not
21 really, because it's the same thing.

22 Q What if they're low to the ground like a
23 Maserati or Ferarri?

24 A Oh, yeah, then you got to do a little
25 extra. Throw some boards down.

1 Q Can you explain that process?

2 A Making a ramp.

3 Q Can you explain the rollover process?

4 A The rollover process, you back up to the
5 -- scope out scenario, back up to the car, pull your
6 winch cable across the vehicle. Hook it to the frame
7 hose, pull, and it will roll over to the truck.

8 Q Is it possible to damage the car if one of
9 these steps isn't done right in the rollover process?

10 A Rollover process, it's already damaged.

11 Q When did you learn these skills?

12 A 2006.

13 Q You learned some mechanic skills at some
14 point, correct?

15 A Correct.

16 Q When did you learn those skills?

17 A When I was a teenager, like 17, 18 from my
18 uncle.

19 Q Do you know how to change oil?

20 A Yep. Yes. I'm sorry.

21 Q Saying yeah is a verbal answer so it can
22 be taken down. As long as you're not nodding or
23 shaking your head.

24 A Yes, sir.

25 Q What other mechanic skills did you learn?

1 A Tune ups, brakes, recharge the AC, fixing
2 your heater. Basically routine maintenance.

3 Q Have you ever performed any of these
4 services for friends?

5 A Yes.

6 Q Family?

7 A Yes.

8 Q How about other individuals that have
9 asked for it?

10 A I mean, not everybody. But I mean, as far
11 as friends and family, yeah. Sometimes I might be
12 riding with them on my way home. Other times, I
13 don't have time.

14 Q When is the last time you did some
15 maintenance on a car that wasn't your own?

16 A That wasn't my own?

17 Q Yes.

18 A Last week.

19 Q Did you do any maintenance in 2016?

20 A No --

21 MR. BENJAMIN: On cars that wasn't
22 his own?

23 Q (By Mr. Mahoney) On a car that wasn't your
24 own?

25 A Yeah.

1 Q 2015?

2 A Yeah.

3 Q 2014?

4 A Yes.

5 Q 2013?

6 A Yes.

7 Q How about your own car?

8 A Of course. I -- yeah, routine maintenance

9 every three months, every year. And of course

10 whenever something happened out the blue.

11 Q Have you ever charged your friends for
12 performing mechanic services?

13 A No. I just tell them to just throw me
14 something. I do it out the goodness of my heart.

15 Q When you say throw you something, that's
16 money, correct?

17 A Yeah. Basically a tip.

18 Q How about for family?

19 A A tip so I can get something to eat. I
20 got kids to feed. I mean, I don't run it like a
21 business, if that's what you're trying to say.

22 Q So family will tip you for the maintenance
23 that you do?

24 A I mean, yeah. Tip me or -- you know, they
25 pay me for my work, you know. If the shop was going

1 to charge them \$400, and then they pull up and I hear
2 your car is just making all types of noise and I know
3 you got kids, I don't want my little cousins and my
4 niece and my nephew in there with you riding with
5 that noise. So, I go ahead and I do it, because they
6 know they got to pay \$400, they go, like, here, Man,
7 just take this hundred.

8 Q What's the most you've been paid for
9 performing maintenance on a car, other than your own?

10 A Roughly, a hundred to a hundred and twenty
11 five, depend on the services.

12 Q Is there any difference in how you're paid
13 by friends versus family?

14 A No, because most of my friends are like my
15 family.

16 Q How about individuals that aren't friends
17 and family?

18 A If I don't know you, I'm not going to do
19 it for free, unless it depends on what it is. If
20 it's something I can just put together real quick,
21 then here, there you go. Get out the street.

22 Q Have you ever charged an individual that
23 wasn't a friend or family member more than \$125 for a
24 maintenance?

25 A No.

1 Q Have you ever performed tow services for
2 friends?

3 A If I call it into the shop.

4 Q How about family?

5 A If I call it into the shop.

6 Q Were you ever allowed to keep the truck at
7 Ideal Towing after hours?

8 A If I work extra late, yeah. And then plus
9 I stayed where I was zoned, so there would be a truck
10 out there when the shift starts for me, every now and
11 then. But you have to bring it to the yard most of
12 the time. But you had to get permission before you
13 could do that.

14 Q And during those instances when you kept
15 the truck, did you park it at your house?

16 A I had to go to sleep, of course.

17 Q What was your designated area when you
18 worked at Ideal Towing?

19 A Northeast Atlanta all the way down to
20 Decatur before you get to like Lithonia.

21 Q So at the edge of Lithonia?

22 A I think it stopped before that though. It
23 was kind of big at first when I was there.

24 Q Where did you live at the time you were
25 working at Ideal Towing?

1 A In Decatur.

2 Q Was your house in a designated area?

3 A Yeah, I guess. Close to the borderline.

4 Q Can you name someone that you performed
5 mechanic services for?

6 A During which time?

7 Q 2016.

8 A My best friend, Al Ranson.

9 Q His last name is Ranson. What's his first
10 name?

11 A Al.

12 Q And how much did he pay you for the
13 maintenance?

14 A Nothing.

15 Q Can you name someone that paid you for
16 maintenance in 2105?

17 A No, because I took some time off from work
18 and only people's cars. People don't like to pay
19 these days. You can fix their car and they take off
20 on you. So, I didn't fix too many people's car they
21 wasn't family in '15 and '16. I know those right
22 there, those folks you have now, I stay in touch with
23 all of them.

24 Q Can you think of someone's name in 2015
25 who you performed maintenance for that failed to pay

1 you?

2 A Someone that didn't pay me or that paid me
3 -- didn't pay?

4 Q First someone that didn't pay you.

5 A Didn't pay me?

6 Q That was supposed to.

7 A No. Never let it get that far.

8 Q How about someone that did pay you?

9 A Paul Nurse.

10 Q How do you spell his last name?

11 A N-u-r-s-e.

12 Q How much did he pay?

13 A \$30.

14 Q Do you know what month that occurred?

15 A No.

16 Q Do you know what time it occurred?

17 A No.

18 Q Did you perform tow -- I mean maintenance
19 for other people in 2015?

20 A No. Not that I can recall.

21 Q So you could have done maintenance for
22 someone in 2015, but you don't remember right now?

23 A No. It's like years ago, you know. You
24 busting my brain now.

25 Q I promise I'm not trying to trick you.

1 A It's all good.

2 Q Do you remember how many people you
3 performed maintenance for in 2014?

4 A No.

5 Q Could you give me an estimate if I gave
6 you a number?

7 A Like?

8 Q Less than 50?

9 A Yeah. Way less than 50.

10 Q More than five?

11 A Probably.

12 Q Less than 25?

13 A (Witness nods head.)

14 MR. BENJAMIN: Verbal response.

15 THE WITNESS: Yes.

16 Q (By Mr. Mahoney) Did you perform any of
17 this maintenance at night?

18 A No.

19 Q Is lighting important for doing
20 maintenance?

21 A It is.

22 Q Did you have a garage that you did this
23 maintenance in?

24 A No.

25 Q What were your days off at Ideal Towing?

1 A I guess -- I know Thursday was one of
2 them. I think I picked Sunday and I asked for a
3 second day.

4 Q When did you ask for the second day?

5 A Probably about five to six months after I
6 was there.

7 Q Did your designated area change while you
8 worked at Ideal Towing at any time?

9 A No. Not that I recall anyway.

10 Q Were there any other changes to your days
11 off while you worked at Ideal Towing?

12 A No.

13 Q Do you know how much money you were paid
14 in 2014 for maintenance?

15 A No.

16 Q If I gave you a number, could you tell me
17 if it was or more or less than that number?

18 A Go ahead.

19 Q Less than 10,000?

20 A Man, yeah.

21 Q More than \$500?

22 A No.

23 Q More than \$50?

24 A I'll say -- I'll say right there.

25 Q Total or per person?

1 A Probably per person, but it was like I do
2 quick maintenance so ain't nothing really quick going
3 to cost more than \$250.

4 Q I got you --

5 A So a tune up, I might charge you \$50 to
6 put your spark plugs in, you know. Things like that.

7 Q Right. Are there any types of vehicles
8 that you can't perform maintenance on?

9 MR. BENJAMIN: Objection to form.

10 THE WITNESS: Yeah.

11 Q (By Mr. Mahoney) Can you name a type of
12 car that you can't perform maintenance on?

13 A I'm not going to touch a Maserati.

14 Q How about BMWs?

15 A Not going to mess with that either.

16 Q How about a Lexus?

17 A Unless it was a light bulb, I'm not going
18 to mess with that either.

19 Q So not luxury cars?

20 A No. I don't too much mess with those.

21 Q You can do maintenance on a truck though,
22 right?

23 A Which truck.

24 Q A regular pickup truck?

25 A Gasoline or diesel?

1 Q You tell me.

2 A I can't do diesel. I can work on gasoline
3 engines.

4 Q How about motorcycles?

5 A No.

6 Q Between 2006 and the present, have you
7 ever towed a car for a friend?

8 MR. BENJAMIN: Objection. Asked and
9 answered.

10 THE WITNESS: What do you mean?

11 Q (By Mr. Mahoney) Have you ever towed a --
12 towed a car for a friend?

13 MR. BENJAMIN: Same objection.

14 Q (By Mr. Mahoney) Between 2006 and present.

15 A Between 2006 and now, probably yes.

16 Q Were any of those tows done outside of one
17 of the companies you worked for?

18 A It was done when I was with J&J.

19 Q Friends as well?

20 A Yes. He knew about it.

21 Q How about other individuals?

22 A If they know about me, I'll tow it.

23 Q What if an individual saw you and they're
24 in some kind of distress, they could ask you?

25 A Yes.

1 Q How much were you paid by these
2 individuals to tow?

3 A Whatever the company told me to charge
4 them.

5 Q At J&J?

6 A Whatever he told me to charge them.

7 Q How did they pay you?

8 A Cash.

9 Q Ever credit cards?

10 A No.

11 Q Ever by check?

12 A No.

13 Q Did you retain any of the cash that you
14 got from the customer?

15 A Yeah, the ones that almost split from me.
16 I never took any cash. I don't play with nobody's
17 money.

18 Q Have you ever owned your own tow truck?

19 A No.

20 Q Have you ever rented a tow truck?

21 A No.

22 Q Have you ever borrowed a tow truck?

23 A I guess from the job to do their work, if
24 you consider that.

25 Q Have you ever been lent a tow truck?

1 A From the job if they lent it to me to do
2 their work.

3 MR. BENJAMIN: Sometime in the next
4 few minutes, can we take a short restroom
5 break?

6 MR. MAHONEY: Now is a good time.

7 MR. BENJAMIN: Okay.

8 (Recess was taken.)

9 Q (By Mr. Mahoney) Does damage sometimes
10 occur to vehicles that are brought onto the tow
11 truck?

12 A If they're improperly hooked or the
13 clearance too low.

14 Q Has that ever happened when you hooked up
15 a car?

16 A No. Not that I recall.

17 Q If you were to damage a car while you were
18 hooking it up, who would pay for that?

19 MR. BENJAMIN: Objection to form.

20 Are you also speaking Ideal or anyplace?

21 MR. MAHONEY: I'm talking about in
22 general.

23 MR. BENJAMIN: Object to form. You
24 can answer if you can.

25 THE WITNESS: The company usually

1 pays for it. They take it out your check.

2 Q (By Mr. Mahoney) So the money for the
3 damage comes from your money?

4 A Basically. Well, it depends on how much
5 the damage is. If it's not that much, it's not going
6 to make a big deal.

7 Q At Ideal, was damage done to cars while
8 hooking -- hooking it up to the tow truck, did that
9 also come out of your money?

10 MR. BENJAMIN: Objection to form.

11 THE WITNESS: After it's paid for.

12 Depends on what it is, then they get their
13 money back.

14 Q (By Mr. Mahoney) But it comes out of your
15 money?

16 MR. BENJAMIN: Objection. Assuming
17 it happened.

18 THE WITNESS: I mean, what is --
19 it's took out your check, so.

20 Q (By Mr. Mahoney) And I'm not saying that
21 this happened today specifically, but you would be
22 responsible for it.

23 A I mean, from experience of ever having
24 somebody -- 11 years like once or twice and something
25 happened, yeah, they -- my company paid for it,

1 whatever it was. Most of the time it wasn't no more
2 than about 3 or \$400, so eventually, they'll take a
3 little bit out my check, like, ask me what I -- can I
4 afford \$50 a week or whatever out my check, or a
5 hundred dollars a check until it's paid off.

6 Q Is that a risk that comes with operating a
7 tow truck?

8 A Yes.

9 Q What was your routine on a work day as a
10 tow driver?

11 A Come in, pretrip your truck, make sure you
12 got everything, go out to the zone.

13 Q What's everything?

14 A Equipment.

15 MR. BENJAMIN: Is your question for
16 Ideal?

17 MR. MAHONEY: Not at this time.

18 MR. BENJAMIN: Okay. In general as
19 a tow truck driver.

20 THE WITNESS: In general, a tow
21 truck driver. Equipment.

22 Q (By Mr. Mahoney) What kind of equipment?

23 A Chains, straps, make sure the light
24 working, make sure all your beacons work, make sure
25 you're DOT ready.

1 Q What is DOT ready?

2 A Everything that goes over the DOT
3 inspection. Always use your flashers and your
4 emergency triangles.

5 Q What does DOT stand for?

6 A Department of Transportation.

7 Q And is that state department of
8 transportation or federal?

9 A Well, Georgia is a state. State, I guess.

10 Q And I don't want you to have to speculate.

11 A Okay.

12 Q So if you do know if it's state, federal
13 or both, please answer the question --

14 A Well, first of all, I say state because
15 from way I see, it's Georgia Department of Public
16 Safety. So I say state.

17 Q So you see the Georgia Department of
18 Public Safety?

19 A Uh-huh. Yes, sir.

20 Q All right. And you also see Department of
21 Transportation?

22 A Yes, sir.

23 Q Have you ever towed a vehicle out of
24 state?

25 A Yes.

1 Q Where?

2 A Alabama, South Carolina.

3 Q How about Tennessee?

4 A Are you talking about for Ideal?

5 Q Yes. So, let me go back.

6 For Ideal, did you ever tow a vehicle out
7 of state?

8 A Probably South Carolina or Alabama.

9 Q How about --

10 MR. BENJAMIN: Do you know?

11 THE WITNESS: I haven't been out --
12 I haven't been out no more than once or
13 twice. So I'll say Alabama once, South
14 Carolina once.

15 Q (By Mr. Mahoney) How about Tennessee?

16 A No.

17 Q North Carolina?

18 A Not for Ideal, no.

19 Q Did the customer travel with you when you
20 went out of state?

21 A Sometimes.

22 Q Are there safety protocols that relate to
23 the customer riding with you?

24 A Well, yeah.

25 MR. BENJAMIN: Objection to form.

1 Q (By Mr. Mahoney) Name them, please.

2 A No more occupants than your vehicle can
3 withstand. So like normally that's one or two.
4 Everybody got to have on their seatbelts. Usually --
5 sometimes I ride by myself and they drive behind me.

6 Q And how do you know about those safety
7 protocols?

8 A I mean, that's just driving period.

9 Q Okay.

10 A That's -- I'm sorry. I'm not trying to be
11 funny, I'm just saying...

12 Q I mean, is it just following the law
13 generally, or is it something that you have to know
14 as a tow driver?

15 A No, you have to follow the laws. The law
16 is law.

17 Q Is there any regulation for occupancy, for
18 instance, that relates to you as a tow driver, do you
19 know -- do you know?

20 A If it's not a customer, then ain't nobody
21 with you.

22 Q But you can carry up to two customers with
23 you?

24 A If you have enough seats for that.

25 Q And who told you that?

1 A AAA. If you got enough seats for it, and
2 they ask. You tow ride got -- two members riding,
3 and say okay. Can you carry them, yeah. Do you have
4 room, yes.

5 Q After you ensure that you're DOT ready,
6 what happens next?

7 A You go to the zone, start your work day.

8 Q When do you eat breakfast?

9 A Whenever I get a chance and get lucky to
10 stop long enough.

11 Q What about lunch?

12 A Whenever you get a chance to stop long
13 enough.

14 Q How about dinner?

15 A Maybe when you get off.

16 Q Is there any rule against eating when
17 you're waiting for calls?

18 MR. BENJAMIN: For which employer?

19 Is it a law? What are you asking?

20 Q (By Mr. Mahoney) When you worked for Ideal
21 Towing, was there any rule against eating while you
22 were waiting for calls?

23 A No. Not that I know of.

24 Q Was there a rule against running an errand
25 while you were waiting for calls?

1 A Yeah. You got to get permission and make
2 sure it's okay. That's with any job.

3 Q Is that a rule written down somewhere?

4 A Not really. It's just -- yeah, don't go
5 out the zone.

6 Q What if you could accomplish the errand
7 within the zone, could you do that?

8 A I'll ask.

9 Q What if you needed to stop at the bank and
10 you didn't get a call for an hour, could you do that?

11 A Yeah, if it's in the zone. You can stop
12 anywhere.

13 Q Could you take a nap?

14 A Yeah, long as you don't miss that call
15 when it come through.

16 Q Did you always remain sober --

17 A Yes.

18 Q -- while you were waiting for calls at
19 Ideal Towing?

20 A Yes.

21 Q As long as you were sober and could
22 respond to a call, could you do whatever you wanted?

23 MR. BENJAMIN: Objection to form.

24 THE WITNESS: I mean, I'm always
25 going to remain sober. I'm not going to

1 drive a truck under the influence, because
2 if anything happen, I go to prison.

3 Q (By Mr. Mahoney) Did you always remain
4 sober and ready for a call?

5 A Long as I was on shift.

6 Q Did you ever go home while you were
7 waiting for calls?

8 A Yeah, to use the bathroom.

9 Q Did you ever eat lunch at home? For
10 instance, did you have food at home?

11 A No. I just leave, eat in the truck.

12 Q Could you eat your lunch in the driveway
13 of your house while you were waiting?

14 A If it's just a sandwich, yeah, I can smash
15 it back and not have to pull it out.

16 Q Could you throw clothes in the dryer while
17 you're at home?

18 A I wouldn't do that.

19 Q Could you warm up your lunch in the
20 microwave or the oven?

21 A Couple of minutes, yeah.

22 Q What would you do while you're waiting on
23 the call and your food is warming up?

24 A If that tablet go off, I got to be ready
25 to go, so I might not get that food. I'm praying on

1 those couple of minutes.

2 Q I understand that, but if you don't get a
3 call and you're waiting on your food to warm up, what
4 would you do?

5 A I'm going to eat.

6 Q Could you watch TV while you're waiting
7 for the food to warm up?

8 A If I'm looking at it going out the door.

9 Q There's no rule against that, is there?

10 A I guess, no sitting around. I don't know.
11 You can watch TV anywhere.

12 Q On your cell phone for instance?

13 A True.

14 Q Is there any rule against using your cell
15 phone while you're waiting on calls?

16 A Not while you're waiting on calls.

17 Q Do you like any sports?

18 A Yes.

19 Q How about football?

20 A Yes.

21 Q How about college football?

22 A Yes.

23 Q What's your favorite team?

24 A For -- college.

25 Q Okay. Do you ever listen to college

1 football in the radio -- on the radio?

2 A Occasionally.

3 Q If you're in the tow truck?

4 A Occasionally, if they playing -- if
5 whoever I like playing.

6 Q Did you ever do that while waiting for a
7 call?

8 A Of course. Probably.

9 Q What's the least amount of tows you did in
10 a day for Ideal Towing?

11 A That could vary. Two, between two to
12 four.

13 Q And would you clock out if you only had
14 two jobs and it was only 3:00?

15 A What you mean two jobs?

16 Q If you only did two tow jobs --

17 A Okay.

18 Q -- for the whole day between seven and
19 three, would you clock out at three?

20 A No.

21 Q Do you ever clock out early because you're
22 not getting enough jobs?

23 A No, unless they ask do I want to go home.

24 Q Do you ever leave the zone while
25 performing a tow job?

1 A While performing a tow job?

2 Q Yes.

3 A If it's -- the destination that it's going
4 is out the zone, yes. We pick up in the zone. After
5 we pick up, we take off and go anywhere you need to.

6 Q Do you sometimes pick up jobs that are
7 outside of your zone?

8 A If AAA call the company and the company
9 say yeah. And that's only if you close by that area.

10 Q What if you see a -- an individual in
11 distress while you're returning to the zone from
12 outside the zone, can they hail you down?

13 A Can they hail me down? What you mean,
14 just stop me?

15 Q Just wave to you.

16 A They can. It don't mean I'm going to
17 stop.

18 Q Have you ever stopped?

19 A Have I ever?

20 Q Yes.

21 MR. BENJAMIN: At Ideal or ever?

22 Q (By Mr. Mahoney) At Ideal.

23 A At ideal?

24 Q Yes.

25 A No. We had too much going on.

1 Q Did you punch a clock at Ideal?

2 A Yeah.

3 Q Did you do time sheets at Ideal?

4 A No. We did time cards.

5 Q Did you log into any type of --

6 A We had logs --

7 Q -- log --

8 A Yeah, we had log sheets for the tows.

9 Q So you had log sheets of the tows, but did
10 you log into any electronic devices?

11 A Yes.

12 Q What did you log into?

13 A D3 ME tablet.

14 Q Did you ever use a DDS at Ideal Towing?

15 A The phone, yeah. But that was like
16 probably for like about a month or so.

17 Q How does it work?

18 A Basically I -- I hear a chirp, that --
19 talking about the DS, the little chirp, the little
20 digital chirp?

21 Q Is that a device that's in the truck?

22 A It's like a walkie-talkie.

23 Q Was there any type of electronic system
24 mounted in the truck with a GPS?

25 A No. Not that I remember.

1 Q So you said you had some sort of
2 walkie-talkie that you kept with you while you were
3 working at Ideal?

4 A At first.

5 Q Okay.

6 A Then they upgraded us to the tablets.

7 Q And what was the walkie-talkie called?

8 A I guess just D-2 ME.

9 Q And it would let you know when there's a
10 call coming in?

11 A Yeah.

12 Q With an audio sound?

13 A Yeah.

14 Q How are the drivers selected?

15 A I don't know.

16 Q How about with the tablet?

17 MR. BENJAMIN: Objection to form.

18 THE WITNESS: That's dispatch job.

19 Q (By Mr. Mahoney) Dispatch from AAA?

20 A It's from our office.

21 Q So dispatch from Ideal?

22 A I don't know. That part, I don't care. I
23 just go through the channel.

24 Q If there's a closer driver to the call,
25 would they be selected before you?

1 MR. BENJAMIN: Objection to form.

2 THE WITNESS: Possibility.

3 Q (By Mr. Mahoney) What would you expect?

4 MR. BENJAMIN: Objection. Calls for
5 speculation. He says he doesn't know how
6 they were selected.

7 THE WITNESS: Yeah. Most of the
8 time, they say it's because whoever closer.
9 Sometimes you hear the one who closer might
10 not have as much experience.

11 Q (By Mr. Mahoney) And you said "they say."
12 Who says that?

13 A Dispatch.

14 Q Is there any rule against visiting a
15 friend if the friend was in a designated area and
16 you're waiting for calls?

17 A No.

18 Q Did you ever do that?

19 A If I was riding by and I seen them, stop,
20 hey, how you doing. Pull off.

21 Q Could you use that location as a waiting
22 spot until your next call came?

23 A I could.

24 Q Were you ever disciplined for napping
25 while you were waiting on a call?

1 MR. BENJAMIN: At Ideal?

2 Q (By Mr. Mahoney) At Ideal.

3 A No.

4 Q Weren't you supposed to fill out time
5 sheets while you worked at Ideal?

6 A Fill out?

7 Q Yes.

8 A Put my name on it.

9 Q Did you always do that?

10 A Yeah. Unless you wanted somebody to run
11 off with your money?

12 Q But you weren't paid hourly, were you?

13 A No.

14 Q Did you sign any form of agreement to work
15 with Ideal?

16 A Of course, application.

17 Q Other than an application. An agreement?

18 A Not that I recall. Only if they with the
19 package.

20 Q What did you say?

21 A I said only if they with the package, Man,
22 to get the job, yeah.

23 Q Is there an option on the tablet to accept
24 the job?

25 A Yes.

1 Q Is there a function on the tablet to
2 decline the job?

3 A Yes.

4 Q How would a non AAA individual request a
5 tow? Tell me the process from start to finish.

6 A I don't know. I guess they call AAA. I
7 don't know.

8 Q Could they ask you for tow service?

9 A They can, but I'm going to give you a --
10 I'm going to tell you to call the number on the
11 truck.

12 Q Could you call the number on the truck on
13 their behalf?

14 A I don't need the tow.

15 Q So you never called the company to ask
16 them --

17 A I mean -- I mean, yeah, if the person
18 don't have a phone or something, I call them, yeah,
19 on my phone. And eventually I'm going to give them
20 the phone, because they the one who needs the tow so
21 they need to describe their car.

22 Q And after you call the company, what
23 happens?

24 A They will give you a yay or nay to do it
25 and give you a price.

1 Q And if they approve it, you do the job?

2 A If they approve.

3 Q And then what happens?

4 A Go on about my business, back to the zone.

5 Q How is payment handled?

6 A Just cash. Call the office if it's a

7 card.

8 Q What do you do with the cash?

9 A Bring it back to the job.

10 Q And you earn a percentage of that?

11 A I guess, at the end of the week.

12 Q Was there a quota imposed by Ideal Towing
13 on how many tows you had to perform in a day?

14 A No.

15 Q How about in a week?

16 A In a week, yeah, if you want to reach a
17 bonus.

18 Q What was the number?

19 A I think you got to get like up to 40.

20 Q 40 tows in a week?

21 A Yeah. If you don't get over 40, they just
22 start saying something.

23 Q Oh. So if you did less than 40, you would
24 start talking to the owner?

25 A Talk to for what? That's just what you

1 done, that's what you done, I guess.

2 Q You said there was a quota. Was that like
3 written out?

4 A Well, it's not a quota that you got to --

5 Q Okay.

6 A That you going to get fired if you don't
7 meet, I mean, because if don't nobody break down that
8 day, don't no cars get towed that day. You can't
9 fire me for that. That ain't my...

10 Q So when you testified that there was a
11 number 40, 40 cars that had to be towed, that was
12 just your -- what you believed was reasonable?

13 A Yeah, that's -- that's -- it's like a
14 milestone. I mean, that's the quota, and so you try
15 to reach it to see if you get an extra dollar on your
16 check.

17 Q That wasn't imposed by the company?

18 A Huh?

19 Q That wasn't imposed by the company on you,
20 was it?

21 A It's on -- it's in the thing.

22 Q On what?

23 A It was on the ap.

24 Q The ap?

25 A Application.

1 Q The employment application?

2 A If you, yeah, tow this many cars, you
3 know, in the -- yeah, the application. Or I was told
4 anyway. So either way it go, both of them. Whatever
5 I missed, somebody told me.

6 Q Okay.

7 A And I recall there was a supervisor saying
8 to me, Hey, Man, do over 40 cars, Man, you see some
9 extra money, Man, get some extra money. Get over 40,
10 I hope it's my week.

11 Q So that sounds like that was an incentive
12 to get over 40 to get more money versus something you
13 would be disciplined for if you didn't get to 40. So
14 explain that a little bit. Is it an incentive or was
15 it a quota?

16 A It's like an incentive, I guess. If
17 that's what you want to flip it, it was a incentive.

18 Q That's fine. That's what I was asking.

19 A It's not -- that's -- I don't -- I didn't
20 get in trouble for not making 40.

21 Q Were -- oh, excuse me --

22 A Like if you get two and while everybody
23 getting 20 something total, it's like hey, Man,
24 what's going on.

25 Q Right. Was there instances when you could

1 help a customer without towing their vehicle while
2 working at Ideal?

3 A Where I could help a customer?

4 Q Yes.

5 A Yeah, if it was just a wire, a cable
6 loose.

7 Q And there was no rule against you fixing
8 the loose cable?

9 A We get paid for pulling up. Well, the
10 company do.

11 Q Was there any rule that prevented you from
12 going under the hood of the vehicle?

13 A If it's too much time consuming.

14 Q But was there any general rule that
15 prohibited you from going under the hood of a vehicle
16 --

17 A No, because the way it was, 9 times out of
18 -- 9 times out of 10, it's up under the hood. Some
19 cars, they're in the trunk or up under the back seat.

20 Q What if a customer was locked out?

21 A Then I hope you got a unlock kit.

22 Q But you could help them?

23 A If I got an unlock kit.

24 Q What if they need a tire changed?

25 A If it's a jack on the truck, yeah, if

1 that's what they send me for.

2 Q If that's what Ideal sent you for?

3 A Yes.

4 Q What if they need a jump start?

5 A If Ideal said they need a jump start, you
6 going to go.

7 Q Does Ideal have different departments for
8 light service versus towing?

9 A Well, Ideal is towing.

10 Q Ideal didn't do light service, did it?

11 A Not really, but, I mean, I'm a tow truck.
12 I can jump you off. I can -- I can do everything.
13 The light service can't tow, so they say the little
14 guys.

15 Q And you knew how to do light service prior
16 to working for Ideal?

17 A Yeah.

18 Q Were you required to have specific tools?

19 MR. BENJAMIN: At Ideal?

20 Q (By Mr. Mahoney) At ideal.

21 A At Ideal, a jump box.

22 Q How about a lockout kit?

23 A Yeah.

24 Q What about a flashlight?

25 A If you work at night. I mean, that's up

1 to you if you want to see.

2 Q Did you carry a flashlight with you?

3 A Of course.

4 Q Whose flashlight was it?

5 A Mines.

6 Q Brought from home?

7 A Home, store.

8 Q What other personal tools did you have
9 with you?

10 A My flashlight, my jump box, my lockout
11 kit, GPS. That's it.

12 Q You own the GPS?

13 A Yes.

14 Q Did you prefer it over the one that was on
15 the tablet?

16 A Man, I don't want to use it. I want to
17 see my calls. I ain't got time to be back and --
18 that cause a wreck. Yeah, I preferred it over -- I
19 preferred it over the tablet.

20 Q So it had audio directions?

21 A Yeah, you know, the tablet don't just tell
22 you turn left, turn right, step 1, 2 3 to 10, you
23 know.

24 Q How about the jack?

25 A What about it.

1 Q Did you own a jack?

2 A I didn't own a jack.

3 Q Do non AAA individuals ever request a tire
4 change, jump start or lockout assistance?

5 MR. BENJAMIN: At Ideal?

6 THE WITNESS: Like at Ideal,
7 probably call Ideal for a tire change? Is
8 that way you saying?

9 Q (By Mr. Mahoney) Yeah. Did non AAA
10 individuals ever request a tire change at Ideal?

11 A I mean, I guess.

12 Q Jump start?

13 A Yeah.

14 Q Lockout assistance?

15 A Yeah.

16 Q How did they pay for these?

17 A I guess, cash or card.

18 Q Has your driver's license ever been
19 suspended?

20 A Way back in 2003.

21 Q Why?

22 A I was on the way home from vacation and I
23 had to be to work that night. And so I got caught
24 for speeding. When I send my payment down for it, it
25 had got down there a couple of days later. So they

1 suspend my license for a couple of days.

2 Q Any other time?

3 A No.

4 Q When was it reinstated?

5 A Soon as the money got down there.

6 Q How did you learn about Ideal Towing?

7 A Through a friend.

8 Q What was --

9 A Also from being in the towing game.

10 Q What was the name of the friend?

11 A Chicken Wing.

12 Q Do you know his full name?

13 A No. Man, we always call him Chicken Wing.

14 Q How long have you known him?

15 A I known Chicken Wing probably about --
16 over 15 years, about 20 years.

17 Q What's his first name?

18 A I guess Deo -- I think Deondre, something
19 like that.

20 Q Is he a tow truck driver?

21 A Yes.

22 Q Did he work at any of those tow truck
23 businesses that you worked at?

24 A Ideal. Only reason I got in the towing
25 game.

1 Q Did he tell you that they were hiring?

2 A Yeah.

3 Q Did he put in a word for you?

4 A Yeah. Most of the time, I ain't go down
5 there because I was already working, so just one
6 time. He was like, Man, I just called down there and
7 they told me to come on, come in for an interview.
8 But yeah, he put in a word for me.

9 Q With Michael James?

10 A I guess. I don't know. I just know Kelly
11 told me to come down.

12 Q When did you meet Michael James.

13 A I had to eventually meet Michael James
14 probably like the next week or so, a few days later.

15 Q And why did you have to meet Mike?

16 A He's the owner of the company, one of
17 them.

18 Q Did Kelly tell you he's the owner of the
19 company?

20 A Mike and Tishja.

21 Q Did Kelly tell you that?

22 A He told me I had to meet the owners of the
23 company.

24 Q So Kelly told you you had to meet the
25 owner of the company?

1 A I mean, yeah, you got to. I mean, you
2 want to know who's signing your checks, right?
3 That's why.

4 Q Did you meet Tishja at the same time that
5 you met Mike?

6 A No.

7 Q Were you hired before or after you met
8 Mike?

9 A Before. Mike had to make the -- Mike and
10 Tishja made the final say-sos. Kelly said everything
11 sounds good, she talk to them and then they give you
12 a call back.

13 Q And again, remember, you know, I'm not
14 asking you to speculate anything. So how do you know
15 Tishja had to approve?

16 A I don't know. I just know Tishja say she
17 the owner of the company, so -- and then they
18 married, their names on -- she sign the checks, she
19 do the accounting, they handle everything, so, yeah.
20 You know, and then she let you know, this our
21 company, you ain't fixin' to mess around in it.

22 Q So when you met Mike, did he tell you he
23 was the owner?

24 A He said Hi, I'm Mike, I'm the owner.

25 Q And did he tell you that he was approving

1 you being hired?

2 A He shook my hand, so --

3 Q So he --

4 A Told me to go ahead.

5 Q So he told you you were hired?

6 A (Witness nods head.)

7 Q Tishja wasn't present then, was she?

8 A No.

9 Q So how do you know Tishja approved it?

10 A I don't actually know if she approved it.
11 That's what I'm saying, but eventually, I guess, she
12 the -- I don't know how -- who got power over who.
13 Basically that's not my -- I just wanted you to know
14 I wanted the job.

15 Q And Mike gave the job, correct?

16 A I mean, they finalized it.

17 Q And Mike finalized it, correct?

18 A Yeah, if he don't want you, you ain't
19 working.

20 Q And Tishja wasn't present there when that
21 happened?

22 MR. BENJAMIN: Objection. Asked and
23 answered.

24 THE WITNESS: And you already asked
25 that question.

1 Q (By Mr. Mahoney) And what was your answer,
2 please.

3 A Can you -- I didn't meet them at the same
4 time, so of course, she wasn't there.

5 Q All right. And did Tishja handle clerical
6 duties in the office?

7 A Yeah.

8 Q And --

9 A When you go and get your check, that's who
10 you see.

11 Q And did Mike control the day-to-day
12 operations of the business?

13 A Yeah. If you messed up, he found out,
14 you're in trouble.

15 Q And why did you switch from wage jobs to
16 commission-based pay?

17 A Actually, I don't know. I mean, a job is
18 job to me. But then eventually I found out wage
19 jobs, you get messed over more.

20 Q And why did you enter the tow business?

21 A Because I love cars and I love towing.

22 Q Did you ever take time off while you
23 worked at Ideal?

24 MR. BENJAMIN: Other than his
25 scheduled days off?

1 MR. MAHONEY: Yes.

2 THE WITNESS: If I was sick, if I
3 had to go get one of my kids, emergency at
4 home. I don't get sick like that.

5 Q (By Mr. Mahoney) How about holidays?

6 A If that's my scheduled off day.

7 Q How about Christmas?

8 A If I was scheduled to be off. Other than
9 that, I'm working.

10 Q Could you request that holiday off?

11 A You can request it, but that don't mean
12 you going to get it.

13 Q Did you ever request a holiday off?

14 A Valentine, probably -- but no, because I
15 ain't end up being off on Valentine on that year, on
16 that day. So, no, because I worked all the holidays.

17 Q How many sick days did you have?

18 A Out of -- one, maybe two, I guess.

19 Q How many -- how much time off did you
20 take?

21 A Other than my scheduled off days, probably
22 like one or two days if I was sick. But, none.

23 Q You said there were also emergencies that
24 required you to ask for time off.

25 A No. I mean, if my child get sick, I got

1 to go get my child. I can't leave them.

2 Q I understand. How many times did that
3 happen?

4 A I can't recall. My son got asthma. So
5 it's like right now, I can be sitting right here and
6 if that call come, I'm out. I don't want -- I don't
7 want to be, but asthma you can't play with. And my
8 son done almost died.

9 Q Now, I understand you had some family
10 obligations that caused you to take time off or
11 change your schedule. I'm going to ask you about
12 that, so if you need a break or anything like that,
13 just let me know and that's fine. Okay?

14 A All right.

15 Q Tell me about your family obligations that
16 caused you to take time off.

17 MR. BENJAMIN: Like that actually
18 caused you to take time off at Ideal.

19 Q (By Mr. Mahoney) Other than your son
20 having asthma.

21 A None. Usually I drop him off at home and
22 keep going.

23 Q So you didn't have any other obligations
24 that caused you to have time off?

25 A Huh-huh. I don't want time off unless

1 it's my off days.

2 Q Now, you said you would drop him off and
3 you would go back about your business.

4 A Yeah. If it's not major, I drop him off
5 with his mom and I keep going to work.

6 Q Okay. But that was -- it happened during
7 your on-call time?

8 A Yes. I'm going to call them, let them
9 know what's going on. Usually they was big on family
10 so -- they had kids, so they told me to go ahead and
11 knock it out. And I knock it out and I get back on
12 shift.

13 Q Did you ever have to come in late because
14 of family issues?

15 A Well, one time when my mom was living, so
16 I would say probably yeah.

17 Q And did you ever have to leave early
18 because of family issues?

19 A Yeah.

20 Q Did you ever have to take a day off for
21 that reason?

22 MR. BENJAMIN: Objection. Asked and
23 answered.

24 THE WITNESS: Yeah, I answered that
25 question. I think that's what it's called,

1 but it's not life threatening that, like, I
2 can leave him at home with his mom or hurry
3 him home to his mom because -- and I keep
4 going on to work.

5 Q (By Mr. Mahoney) Was it ever called for
6 that you had to miss a whole day?

7 A That I had to miss a whole day?

8 Q Yes.

9 A Only if there was a doctor's appointment,
10 yeah.

11 Q Do you pay for your own tools?

12 A Like my jump box. I mean, all the tools I
13 had before I came to Ideal, yeah.

14 Q You pay for your uniform?

15 A I don't know. I just know it just \$8 a
16 week out your check for dry cleaning. So, I guess,
17 you is paying for it.

18 Q Were you ever paid with checks at Ideal
19 Towing?

20 A Yeah.

21 Q Were you ever paid with cash at Ideal
22 Towing -- by Ideal Towing?

23 A No. I got a check.

24 Q Did you receive tips?

25 A Yes.

1 Q How often?

2 A Whenever they feel like giving it to you,
3 if they had gratitude.

4 Q Daily?

5 A If you lucky.

6 Q Did you receive tips at least once every
7 week?

8 A Maybe. You going to have some weeks, it's
9 just not going to be that week.

10 Q Did it happen at least once every other
11 week?

12 A Probably so.

13 Q Did you report what you got in tips?

14 A Didn't have to.

15 Q Who told you that?

16 A Hey, where -- where you got to report it
17 at? I ain't never heard. I mean, because they --
18 hey, you got a tip today, high five. So, I guess,
19 no.

20 Q Who would give you a high five?

21 A Whoever you talking to. One of the
22 drivers, supervisor.

23 Q Did you record how many tips you got?

24 A No.

25 Q How much were you paid in tips?

1 A I don't know. 5 here, 10 there. Every
2 blue moon, you get a 20.

3 Q And that's per individual?

4 A Yeah -- I mean, yeah. Like -- yeah. If
5 somebody tip me \$300, I mean, I'll toll them -- hey,
6 I hope they call me every time.

7 Q That was an example, right? You're not
8 saying somebody did tip you 300 --

9 A No, I'm just saying as an example, yeah.

10 Q What's the most you have been tipped
11 before?

12 MR. BENJAMIN: At Ideal.

13 THE WITNESS: At Ideal, I had a girl
14 tip me like \$60.

15 Q (By Mr. Mahoney) At this time, is there
16 anything that you would like to change, amend or
17 alter from your testimony thus far?

18 A No.

19 Q I have here what I'd like to mark as
20 Defendant's Exhibit 1.

21 (Exhibit No. 1 was marked for
22 identification.)

23 Q (By Mr. Mahoney) Take a moment to look at
24 that document. Do you recognize that?

25 A Contract agreement.

1 Q But do you recognize it?

2 A My name, the pay thing that I was telling
3 you about.

4 Q I'm not trying to trick you. I'm just
5 asking a yes or no question of whether or not you
6 recognize it. I mean, it's just part of laying the
7 foundation that, you know, this is something that you
8 know something about.

9 A I mean, I'm saying yeah. This is what you
10 get when you get hired.

11 Q Okay.

12 A They give you that, tell you to sign it.

13 Q And you received this when you were being
14 hired?

15 A Yeah, when you get hired. When you being
16 hired, you get hired, you come sign it.

17 Q And what's the date on this document?

18 A Well, I mean, I -- it was late because
19 Tishja and James -- Tishja and Mike wasn't there when
20 I got hired. I met them like a week or so after.

21 MR. BENJAMIN: He's asking what the
22 date is.

23 THE WITNESS: 6/6/14.

24 Q (By Mr. Mahoney) So, are you saying June
25 6th is when you met Mike James?

1 A No, I can't say that.

2 Q But your testimony is that you received
3 this about a week after you got hired?

4 A My testimony saying I received that a week
5 after a week I was hired?

6 Q Yeah. That's my question.

7 A No, because I got hired in, like, April or
8 something, May to April, end of March, April. Yeah,
9 April.

10 Q Okay.

11 A Somewhere along in there, like first of
12 April, end of March.

13 Q Okay.

14 A This is June.

15 Q Okay.

16 A So, I was hired before June.

17 Q Do you see at the bottom of that page
18 where it says exclusivity.

19 A Uh-huh.

20 Q Were you prevented from working other jobs
21 while you were -- between 2014 and 2015?

22 A Yeah, because you going to do 12-hour
23 shifts. You ain't got no time for yourself. If you
24 going to do something else, I mean, you're putting
25 yourself in jeopardy.

1 Q What do you mean "in jeopardy"?

2 A You got to drive -- you got to drive,
3 wherever else you going. You been driving all day
4 for 12 hours, you need to be going home after you get
5 off.

6 Q But you wouldn't be disciplined if you
7 were working another job?

8 A I mean, I'm not trying to get no other
9 job. I'm just going to work this one job.

10 Q Right. My question though is would you be
11 disciplined if you had another job?

12 A I don't know.

13 Q What rule are you aware of that prevented
14 you from getting another job?

15 A I didn't want no other job.

16 Q What rule from Ideal Towing are you aware
17 of that prevented you from getting another job?

18 A I don't know. I'm not aware.

19 Q I have here what I'd like to mark as
20 Defendant's Exhibit No. 2.

21 (Exhibit No. 2 was marked for
22 identification.)

23 MR. MAHONEY: Now, Counsel, your
24 version is not redacted, but the version I
25 gave the court reporter is redacted.

1 MR. BENJAMIN: Very good. Thank
2 you. Just so you understand what he just
3 said is he took off the social security
4 number on the original, so --

5 THE WITNESS: Okay.

6 MR. BENJAMIN: -- if it's used in
7 the court, your social security number will
8 not be filed with the court.

9 THE WITNESS: Okay.

10 Q (By Mr. Mahoney) And before we begin with
11 two, can you look back at Exhibit 1. Is that your
12 handwriting --

13 MR. BENJAMIN: On Exhibit 1.

14 MR. MAHONEY: Yes.

15 Q (By Mr. Mahoney) On Exhibit 1, is that
16 your handwriting on that document?

17 A Yes.

18 Q Now, can we look at Exhibit 2. Is that
19 your handwriting?

20 A Yes.

21 Q And if you look at the second page, is
22 that your signature at the bottom?

23 A Yes.

24 Q And did you write that date?

25 A Yes.

1 Q What is the date?

2 A May 27.

3 Q Is that the day you came in to apply at
4 Ideal Towing?

5 A I guess so. Yeah.

6 MR. BENJAMIN: Do you know.

7 THE WITNESS: I'm not actually sure
8 from years. I just see it's the date
9 that's right there, that's the date that's
10 right there, like I say.

11 Q (By Mr. Mahoney) So just to reiterate
12 without sounding like a broken record, we don't want
13 you to speculate, but if the document helps refresh
14 your recollection of the date, then you can state
15 with certainty -- if you can state with certainty,
16 then you'd say yeah, that was the date.

17 So my question is: Did you write that
18 date?

19 A Yeah. That was the date right there.

20 Q And is that the date you came in to apply
21 to work at Ideal Towing?

22 A Yeah, I guess. Yeah. I'm not going to
23 spec -- yeah. If that's what it say, that's what it
24 say.

25 MR. BENJAMIN: I'm sorry. The

1 answer's still...

2 MR. MAHONEY: The record's going to
3 show that -- that he said, yeah, I guess,
4 but, yeah -- yes is his --

5 MR. BENJAMIN: Okay.

6 MR. MAHONEY: -- is his answer.

7 THE WITNESS: Yeah, that's what --
8 okay.

9 Q (By Mr. Mahoney) Okay. Do you have a
10 reason to dispute that that date is correct, that
11 that's the date you came in to apply at Ideal Towing?

12 A Like I say, I don't know because it was
13 three years ago.

14 Q All right. And if you look at about the
15 fifth line under applicants information, do you see
16 where it says date available?

17 A Yeah.

18 Q What date is written there?

19 A 5/28.

20 Q What year?

21 A 2014.

22 Q Is that the date that you were available
23 to start working at Ideal Towing?

24 A Yeah. When I was at work, yeah, soon as
25 possible. So, yeah, that's the next day.

1 Q If you look over on that same line, do you
2 see where it says desired salary?

3 A Yes.

4 Q And what does that say?

5 A Open for -- it's open, meaning open for
6 discussion.

7 Q All right. Did you discuss what your
8 salary was going to be with Michael James?

9 A Kelly told me what it was. Michael James
10 confirmed it.

11 Q And you agreed to that?

12 A I ain't have no choice. I mean, is it --
13 okay.

14 Q You didn't have a choice?

15 A I mean, I got a choice if I want to accept
16 the job or not. Okay. I need the job, I accepted
17 it.

18 Q All right. If you look down at
19 references, is that Al Ransom, the friend you were
20 talking about?

21 A Yes.

22 Q And is that still his phone number?

23 A No. It's changed three years ago. So,
24 yeah, it's changed. It's not that. That's a cell
25 phone it look like.

1 Q Can you look at the next page?

2 A Okay.

3 Q Do you see where you input Auto Access
4 Towing?

5 A Uh-huh.

6 MR. BENJAMIN: That's a yes, right?

7 THE WITNESS: Yes.

8 MR. MAHONEY: Thanks.

9 Q (By Mr. Mahoney) Is that Robert Glover's
10 phone number?

11 A I think, yeah. That's the business --
12 that's the business phone number. Yes. I don't know
13 if it still his or not.

14 Q Why didn't you list J&J on this
15 application?

16 A Because it didn't say be specific. It was
17 three in a row, and it's three I put there. And J&J,
18 I had an option.

19 Q Had a what?

20 A Had a option to work or not. You know, if
21 I didn't feel like working that day, I didn't go.

22 Q So you had complete control over --

23 A Yeah. He just come ask if I want to ride
24 with him.

25 Q I have here what's marked as Defendant's

1 Exhibit 3.

2 (Exhibit No. 3 was marked for
3 identification.)

4 Q (By Mr. Mahoney) Take a moment to look at
5 that.

6 A Okay.

7 Q Do you recognize that document?

8 A Yes.

9 Q What is that document?

10 A 1099.

11 Q To who?

12 A To me.

13 Q From who?

14 A Ideal Towing.

15 Q Did you receive this 1099 in 2014 or early
16 2015?

17 A 2015.

18 Q Have you ever had a tax ID number?

19 A No. For like a business ID number or just
20 like tax preparation?

21 Q Your answer was --

22 A Okay.

23 Q -- perfectly fine.

24 A I don't have a tax ID number.

25 Q Is the number on this form representative

1 of the money you received from Ideal Towing in 2014?

2 A I guess, if that's what they saying I
3 made.

4 Q Do you have a reason to dispute that's
5 what you received that year?

6 A I don't know. I never seen the
7 itemization.

8 Q Now, you discuss an itemization. I want
9 to be clear. I'm not talking about what you believe
10 should have earned. I'm talking about what you
11 actually received from them.

12 So my question is: Is that what you
13 received?

14 A If that's what it say.

15 Q And do you have a reason to dispute that?

16 A Right now I can't tell if it's a lie or
17 not.

18 Q I have here what's marked as Defendant's
19 Exhibit 4.

20 (Exhibit No. 4 was marked for
21 identification.)

22 Q (By Mr. Mahoney) Take a moment to look at
23 that. Do you recognize that document?

24 A It's a 1099.

25 Q Do you recognize it?

1 A Yeah. It's a 1099. Yeah. My name on it.

2 Q So you received this --

3 A Yes.

4 Q -- from Ideal Towing?

5 A Yes.

6 Q For what year?

7 A 2015.

8 Q Did you receive any other 1099s from Ideal
9 Towing?

10 A No.

11 Q And did you work any other years from
12 Ideal Towing?

13 A No.

14 Q The amount listed there, do you have any
15 reason to dispute that that's what you received --

16 A If that's what they say --

17 Q -- from Ideal Towing in 2015?

18 A No. I can't say that. That's what it is,
19 that's what it is. I don't know if it's a lie or
20 not.

21 Q And as you sit here today, can you think
22 of any evidence that is in your possession to dispute
23 that?

24 MR. BENJAMIN: Objection to form.

25 THE WITNESS: I don't know. No.

1 Q (By Mr. Mahoney) I have here what's marked
2 as Defendant's Exhibit No. 6.

3 MR. BENJAMIN: I think it's 5.

4 MR. MAHONEY: All right. Correct
5 the record. It's Exhibit No. 5.

6 (Exhibit No. 5 was marked for
7 identification.)

8 Q (By Mr. Mahoney) Take a moment to look at
9 that. Do you recognize that document?

10 A Yeah. All this look like the stuff that
11 they give you to sign. Yeah.

12 Q What is that document?

13 A It's a tool doc, a mandatory tool
14 preparation.

15 Q Is that your name at the bottom?

16 A Yes.

17 Q Is that your signature?

18 A Yes.

19 Q And what's the date on it?

20 A June 6.

21 Q What year?

22 A 2014.

23 Q And did you write that?

24 A Yes.

25 Q Did you have any of these tools in your

1 personal possession on June 6, 2014?

2 A Did I have any of them in my possession as
3 my own?

4 Q Yes.

5 A My cell phone, my flashlight, my -- my
6 gloves, and my vest.

7 Q And did you purchase any of the other
8 tools that you did not already have?

9 A Jump box.

10 Q How about a lockout kit?

11 A No. I already had it. And I said lockout
12 kit. I thought I did. I'm sorry.

13 Q That's fine.

14 You didn't own a wrench?

15 A Yeah, but that usually be with the truck,
16 I guess. I ain't bring mine.

17 Q All right.

18 A Not my personal.

19 Q Same thing with the jack?

20 A No.

21 Q When you say no, you mean no you did not

22 --

23 A I mean, no --

24 Q -- you didn't use your own jack?

25 A I don't bring my personal.

1 Q But you did use one?

2 A Yeah. If it was on the truck, it got
3 used.

4 Q At this time, is there anything in your
5 testimony that you want to correct, amend, or alter?

6 A Not really.

7 Q When did -- when did you come to believe
8 that you should have been an employee rather than a
9 commission based contractor?

10 A When I was told I had to be here and I
11 couldn't come on my own time, then you an employee.

12 Q What year was that?

13 A When I started. 2014.

14 Q Did you complain to anyone about the 2014
15 1099 you received in 2014 -- well, in 2015?

16 A I didn't know nobody. So, no.

17 Q So is that a no?

18 A No.

19 Q Did you complain to anyone about the 2015
20 1099 you received in 2016?

21 A No.

22 Q Did you complain to anyone about the
23 amount stated on either of those 1099s?

24 A No, because I didn't know.

25 Q Just to be clear, my last question, I was

1 asking about the amount of the money that you
2 received.

3 A That's with Ideal, I didn't. I just got
4 it.

5 Q Okay.

6 A I don't know what's true or not.

7 Q But you didn't dispute it -- you didn't
8 dispute the 2014 1099 in 2015, did you?

9 A I don't have no way of disputing either
10 one of them because I don't know. All I just know is
11 they say here is what you made and that's what you
12 made.

13 Q And you didn't dispute the amount listed
14 in the 2015 1099 in 2016, did you?

15 A No. Because that's what they said I made.
16 So, I mean, I ain't -- I don't have no proof.

17 Q Weren't you paid by check?

18 A Yes.

19 Q Does Ideal Towing sell any goods?

20 A Does they sell goods?

21 Q Yes.

22 A I don't know.

23 Q Did you ever sell any goods while you were
24 employed at Ideal Towing?

25 A No.

1 Q Did you ever see any Ideal Towing
2 employees contractors, selling any goods?

3 A No.

4 Q Does Ideal Towing provide services?

5 A Towing services, roadside assistance
6 services.

7 Q You worked on Christmas 2015?

8 A Maybe. I don't know. Probably so.

9 Q Did you take any time during that day to
10 spend with your family?

11 A I stay in the zone, so of course I stopped
12 by to say hey to my kids and left.

13 Q Open presents?

14 A If they gave me one.

15 Q What about when they opened their own
16 presents?

17 A Well, yeah, I watched a couple of
18 presents, but that's it. I had to go.

19 Q Did you ever work a different shift at
20 Ideal Towing?

21 A Did I ever work a different shift?

22 Q Yes.

23 A Of course.

24 Q You worked night shift sometimes?

25 A That's where I started.

1 Q Okay. When did you change from night
2 shift to day shift?

3 A Like after 4th of July, somewhere around
4 there. But I'll say probably between 4th of July and
5 August. Around that area.

6 Q So on the 4th of July, you were working
7 night shift?

8 A Yeah. I worked at night.

9 MR. MAHONEY: No further questions.

10 MR. BENJAMIN: Okay. I have a
11 couple.

12 EXAMINATION

13 BY MR. BENJAMIN:

14 Q While you were working at Ideal Towing,
15 did you ever do any maintenance or repairs on cars
16 for Ideal?

17 A For Ideal?

18 Q Yes.

19 A No.

20 Q If you were on duty, during your shift at
21 Ideal and a call came in, would you be required to
22 take that call and go on it?

23 A Yes.

24 Q Had it ever happened to you that you
25 ordered food at a restaurant and then you got a call

1 before your food got there?

2 A Yes.

3 Q What did you do?

4 A Leave.

5 Q Did you get to eat your meal?

6 A No.

7 Q Did you have any way of increasing or
8 decreasing the number of calls that you went on in a
9 week at Ideal?

10 A No.

11 Q Did you go on every call that you received
12 when you were on shift?

13 A If I received it, I went.

14 Q Could you, while you were on shift, but
15 not on a call, be far away from the truck?

16 A No. You got to be within -- you got to be
17 with your truck, if not in your truck.

18 Q Was there a specific amount of time that
19 between receiving a call that you were required to
20 respond?

21 A Not really. Yeah, yeah, yeah. Like
22 within, like, fifty -- like a, what is it, a
23 55-minute time frame or 45 minutes. Whatever --
24 whatever they window is for that time.

25 Q But maybe my question wasn't clear.

1 I mean from the time that you were
2 notified that there was a call in your geographic
3 area, was there a limitation on how quickly you
4 needed to respond that you will take that call?

5 A You put in your -- you put in the time you
6 show. Like if you think it will take you 30 minutes,
7 you put in 30 minutes so the automatic service will
8 call the number back and then let them know that your
9 truck will be arriving in such and such time.

10 Q How soon after you get a notification that
11 there's a tow job for you that you have to notify
12 Ideal in some way whether you're taking the call or
13 not?

14 A They already know.

15 Q How do they know?

16 A It's a soft -- it's a system software. It
17 comes up. So nine times -- like most of the time, I
18 guess, they send it out to you.

19 Q Well, once you were notified that there
20 was a call, would you respond to say, yes, I -- I've
21 heard what you said and I know there's a call?

22 A Yeah. It comes across a tablet. You hit
23 yes.

24 Q Was there any requirement of how quickly
25 you needed to hit yes after receiving notification of

1 a towing job?

2 A Yeah, as soon as you get it.

3 Q Is that what you did?

4 A Yes.

5 Q Did you ever leave Ideal Towing after your
6 shift ended because you received a towing job close
7 to the end of your shift that wasn't finished by the
8 end of your shift?

9 A No.

10 Q So if your shift was supposed to end at
11 7:00 and you got a call at a quarter to seven --

12 A Oh, will I take it?

13 Q Yes.

14 A Yeah.

15 Q And would you be finished by the time your
16 shift ended?

17 A Oh, no. It would -- it would depend on
18 traffic or how far it's going or whatever and how
19 long it take you to get to that call.

20 Q How frequently did you finish your actual
21 work after your shift ended?

22 A After my shift ended?

23 Q Right.

24 A Frequently did I finish my work?

25 Q Yes.

1 A I completed all my assignments.

2 Q Again, maybe my question is not clear.

3 How frequently did you not finish your
4 work for Ideal by the time your shift was supposed to
5 end at 7:00?

6 MR. MAHONEY: Objection.

7 THE WITNESS: Numerous of times. I
8 can't -- I can't count.

9 Q (By Mr. Benjamin) I don't have any --

10 A Mostly -- mostly all the time because
11 everybody be ready to go and I be the last one to get
12 stuck with it.

13 MR. BENJAMIN: Okay. I have no
14 other questions.

15 MR. MAHONEY: Okay. Just recross.

16 EXAMINATION

17 BY MR. MAHONEY:

18 Q Did the calls come in from AAA or Ideal?

19 A I don't know. It just came across the
20 tablet.

21 Q How much communication did you have with
22 AAA?

23 A We let dispatch deal with that, so it was
24 like rare. I mean, we -- very little.

25 Q Did you ever speak to AAA dispatch?

1 A Yeah. Probably.

2 Q You weren't told to bring the truck in an
3 hour before the end of the shift?

4 A No.

5 Q And did you ever take the truck home for
6 any reason?

7 MR. BENJAMIN: Objection. Asked and
8 answered.

9 Q (By Mr. Mahoney) After the shift?

10 A Only if I was told to, if I had
11 permission.

12 Q How did you know if you were speaking to
13 Ideal dispatch versus AAA dispatch?

14 A Because you call AAA dispatch, they call
15 Ideal dispatch. If Ideal can't get through, they'll
16 try to call AAA. We us -- the drivers try not to
17 call AAA because you be on hold so long. You don't
18 want to sit there and hear that music trying to
19 drive. And you're not supposed to drive and talk on
20 the phone on a commercial vehicle.

21 Q And you're talking about when you call the
22 dispatch, correct?

23 A Yeah.

24 Q What about when dispatch calls you?

25 A Which one?

1 Q Do you know the difference?

2 A They'll tell you hi, this is such and such
3 with AAA or there dis -- our dispatch call and say
4 hey, this is -- you know, just whoever on the thing,
5 whoever it is -- the dispatcher is.

6 Q So if dispatch calls and they don't
7 introduce themselves as AAA, do they introduce
8 themselves as Ideal or do you assume that they're
9 Ideal?

10 A You going to know who you working with.

11 Q Who is the dispatcher that -- that calls
12 you --

13 A Yeah, you going to check and see who your
14 dispatcher for the day so you'll know who, you know.

15 Q And who regularly calls? Is it AAA
16 dispatchers or Ideal dispatchers?

17 A Ideal dispatchers call you, but AAA will
18 remind you and sometimes they try to overstep
19 their... But we usually let them get with the
20 office. Sometimes we don't answer the phone. And
21 we'll notify our dispatch that they're doing that,
22 and they'll call and see what the problem is.

23 Q Do driver's change their shifts often?

24 A You have day shift and you have night
25 shift.

1 Q Do they change them often?

2 A Every day.

3 Q I'm not sure if we're on the same page.

4 Can one driver change his shifts from day
5 to night more than once in one week?

6 MR. BENJAMIN: Objection to form.

7 THE WITNESS: Yeah. I mean, if you
8 ask?

9 Q (By Mr. Mahoney) If you have some kind of
10 responsibility you may need to change your shift?

11 A If they need you to work day shift for
12 that day, yeah, he'll ask you. And if you get it, if
13 they go in your --

14 Q Sorry?

15 A Your livelihood --

16 Q Sorry for interrupting you, but when you
17 say he ask you, do you mean another driver will ask
18 you to switch shifts with you?

19 A No, no, no, no, no, no. I'm saying
20 management.

21 Q Oh management?

22 A Yeah. It got be approved. You just can't
23 switch.

24 Q Oh. So you can ask management if you want
25 to change your shift, right?

1 A Well, I mean, yeah, if you feel like
2 that's what you need to do, but I didn't.

3 MR. BENJAMIN: Just on the record, I
4 think there's a miscommunication between
5 switching shifts and swapping shifts.

6 THE WITNESS: Yeah.

7 MR. MAHONEY: Yeah. I was asking
8 can you switch shifts often. I only said
9 swapping because he said he. And I didn't
10 know if he meant another driver or if he
11 meant --

12 THE WITNESS: No. You got to do
13 your shift. Your shift is your shift.
14 Night shift, that's it, you know.

15 Q (By Mr. Mahoney) You switched from day
16 shift to night shift, didn't -- did you switch from
17 night shift to day shift?

18 A Yeah.

19 Q Did you ever shift from day shift to night
20 shift?

21 A From day shift to the night shift?

22 Q Yes.

23 A If I'll go. If I had to stay over and
24 help, yeah, that's considered part of the night
25 shift.

1 Q I mean, did your shift change from being
2 on day shift to being on night shift --

3 A Yeah, I had a crazy schedule when I was
4 working night shift, Man. I was actually kind of
5 good where I would -- I could -- on certain days --
6 like the driver that drives the truck during the day
7 shift, he was an older guy so he was off the
8 weekends. So that was my chance to work like
9 Saturday mornings and get off early from my night
10 shift. So, if that's what you asking, yeah, it's
11 possible, but it got to be agreed upon. And then you
12 got to make sure you can do it. If you agree upon
13 it, then you got to do it.

14 Q So as long as it was approved, you could
15 change your schedule?

16 A Yeah. But I wasn't -- it was not because
17 you wanted to.

18 Q If an individual asks you to do a tow job,
19 do you have to forward that information to Ideal Tow,
20 or can you just decline it right then and there?

21 A I mean, yeah, you can decline it. I mean,
22 that's not generated from Ideal, so it's up to me to
23 call in and do it, or sometimes if it was just
24 something you didn't want to deal with, don't put
25 yourself in that predicament.

1 Q If you received a call from Ideal and you
2 told them you're at lunch, they wouldn't make you
3 stop your lunch, would they?

4 A Just so you took it with you, because you
5 -- because you drive.

6 Q But if you said you're on your lunch hour,
7 for instance, --

8 A We don't get lunch breaks.

9 Q -- you can't do that?

10 A We don't get lunch breaks. You sneak a
11 lunch in whenever you get -- can find the time. Get
12 a fast food burger joint that can put it out quick
13 enough.

14 Q Did you ever receive a call for a job you
15 couldn't perform?

16 MR. BENJAMIN: Objection to form.

17 THE WITNESS: Yeah. If a car is too
18 big and you can't perform it, you got to
19 call in and let your dispatch know that
20 this is job for a medium truck. That's the
21 only way.

22 Q (By Mr. Mahoney) Was there any
23 restrictions on where you could take the truck?

24 A On where I took the truck?

25 Q Yes.

1 A Yeah, if they ain't know how you -- taking
2 it to zone. You got to stay in the zone.

3 Q Right. But you can take it anywhere in
4 the zone?

5 A Anywhere within the zone?

6 Q Yeah.

7 A You can go anywhere you like.

8 Q Isn't it true that you can increase the
9 amount of tow jobs you performed in a day by having
10 individuals flag you down and calling in and going on
11 that tow job?

12 A Yeah, but then it's also up to Ideal if
13 they want to take a call or not. It depends. If
14 we're busy with AAA that day, we're not taking no
15 privates, because all it's doing is hold up
16 everything. But if it's slow, yeah, we might do a
17 couple.

18 Q And you could decrease the amount of jobs
19 you performed if you didn't take any of those private
20 individuals that tried to --

21 A I wouldn't actually say decrease. The pri
22 --

23 Q But it would be less --

24 A The privates ain't going to make no
25 difference if the calls running. One private

1 screaming you down compared to about 10 calls coming
2 in.

3 Q You get paid by the job though, don't you?

4 A Yeah.

5 Q And if you don't take that, you have to
6 wait for a call, isn't that one less that you did
7 prior to the next call?

8 A Yeah. It can be, but depends on if -- if
9 we got AAA calls, which we're not going to do -- our
10 priority is AAA. It's road -- it's that roadside.

11 Q You don't know when the next AAA call's
12 going to come in, do you.

13 A Well, it might be already there. You
14 don't know until you finish -- you log out from that
15 call, then you get your affirm. Because that might
16 -- soon -- soon as I text -- soon as I hit complete,
17 beep, and go through the system, it might beep, oh,
18 that's another one.

19 Q Right. And also it could take an hour for
20 that to happen?

21 A Every -- yeah. So, you know, then -- if
22 that happened, then, yeah, I guess you could take a
23 private. But who's saying somebody going to be out
24 there at that hour.

25 MR. MAHONEY: No further questions.

1 MR. BENJAMIN: Just one.

2 EXAMINATION

3 BY MR. BENJAMIN:

4 Q If you saw a private person flagging you
5 down, who's decision was it on whether you would do
6 that call? Was that up to Ideal or was that up to
7 you?

8 A That's up to Ideal if you call it in.

9 Q Did you call them in?

10 A If I stopped.

11 MR. BENJAMIN: No questions.

12 MR. MAHONEY: One more.

13 MR. BENJAMIN: Let's keep them in
14 there scope of redirect.

15 MR. MAHONEY: Yes.

16 EXAMINATION

17 BY MR. MAHONEY:

18 Q Could Ideal approve a call if you didn't
19 notify them about it?

20 A If I didn't notify them about it?

21 Q Yes.

22 A If I don't notify nobody, they don't know.
23 But I'm not going to stop and not notify anybody
24 because they could tell where -- everywhere I'm
25 sitting.

1 Q Right. And --

2 A So if you just stop --

3 Q And I'm not sure if that was clear. Let
4 me rephrase it.

5 And we're talking about individuals that
6 flagged you down.

7 A Uh-huh.

8 Q Specifically.

9 A Uh-huh.

10 Q Could -- did Ideal have an opportunity to
11 approve those if you never called it in?

12 A Well, if they know about it before I get
13 to that point, yeah, they'll call and say hey, you
14 coming down 285? Yeah. You by Northlake now, right?
15 Yeah. Well, I got a car down here by I-20, she just
16 called in. You'll stop and pull over for her? It's
17 a such and such. Do that and they let you know
18 what's going to be.

19 Q I understand that, but I'm talking about
20 specifically when they flag you -- when an individual
21 flags you down --

22 A Right down.

23 Q Right.

24 A Okay. I'm not going to stop and not call
25 my employer.

1 Q Right. And it's your decision whether or
2 not to --

3 A Yeah. It depends on what's going on. If
4 I'm in a rush going to the next call, I ain't
5 stopping.

6 MR. MAHONEY: No further questions.

7 MR. BENJAMIN: We'll read and sign.

8 MR. MAHONEY: All right. Thank you
9 very much for your time.

10 (Whereupon proceedings concluded at
11 1:21 p.m.)

12 (It was stipulated and agreed by and
13 between counsel for the respective parties
14 and the witness that the signature of the
15 witness to the deposition be reserved.)

16

17

18

19

20

21

22

23

24

25

DISCLOSURE

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia which states: "Each court reporter shall tender a disclosure form at the time of the taking of the deposition stating the arrangements made for the reporting services of the certified court reporter, by the certified court reporter, the court reporter's employer or the referral source for the deposition, with any party to the litigation, counsel to the parties, or other entity. Such form shall be attached to the deposition transcript," I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of L. George Court Reporting. L. George Court Reporting was contacted to provide court reporting services for the deposition. L. George Court Reporting will not be taking this deposition under any contract that is prohibited by O.C.G.A. 9-11-28(c).

L. George Court Reporting contract/agreement to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition.

L. George Court Reporting will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation.

Lamarra George, CCR-2582
May 4, 2017

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 119 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 4th day of May, 2017.

Lamarra George, CCR-2582
My commission expires on
the 1st of April 2017.

DEPOSITION OF CARLON LEWIS/LG

I do hereby certify that I have read all questions propounded to me and all answers given by me on the 4th day of May 2017, taken before Lamarra George, and that:

- _____ 1) There are no changes noted.
 _____ 2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

DEPOSITION OF CARLON LEWIS/LG

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

Page No. _____ Line No. _____ should read: _____

If supplemental or additional pages are necessary,
please furnish same in typewriting annexed to this
deposition.

CARLON LEWIS

Sworn to and subscribed before me,
this the _____ day of _____, 20____.

Notary Public

My commission expires: _____

\$	125 ^[1] - 19:9 15 ^[1] - 76:16 17 ^[1] - 40:17 18 ^[4] - 10:14, 10:18, 11:5, 40:17 199 ^[1] - 2:11 1:16-cv-01359-TWT ^[1] - 1:8 1:21 ^[1] - 118:11 1st ^[1] - 120:23	27 ^[1] - 91:2 28 ^[1] - 28:11 285 ^[1] - 117:14	770-859-0754 ^[1] - 2:7 7:00 ^[2] - 106:11, 107:5	ad ^[1] - 24:18 additional ^[1] - 122:14 address ^[4] - 9:11, 23:3, 36:17, 36:25 advertise ^[2] - 24:22, 24:25 advertised ^[1] - 24:11 affect ^[2] - 5:19, 6:13 affirm ^[1] - 115:15 afford ^[1] - 54:4 afternoon ^[2] - 21:9, 21:10 agency ^[1] - 119:16 ages ^[1] - 9:25 ago ^[5] - 15:2, 26:5, 46:23, 92:13, 93:23 agree ^[2] - 5:24, 112:12 agreed ^[3] - 93:11, 112:11, 118:12 Agreement ^[1] - 4:4 agreement ^[3] - 67:14, 67:17, 86:25 ahead ^[4] - 43:5, 48:18, 79:4, 83:10 ain't ^[17] - 27:10, 49:2, 57:20, 70:9, 74:17, 77:4, 78:21, 79:18, 81:15, 85:17, 88:23, 93:12, 99:16, 101:16, 114:1, 114:24, 118:4 Al ^[2] - 45:8, 93:19 al ^[1] - 45:11 Alabama ^[3] - 56:2, 56:8, 56:13 allow ^[1] - 7:14 allowed ^[7] - 15:13, 15:14, 16:21, 18:9, 19:14, 29:4, 44:6 Allstate ^[1] - 28:17 almost ^[3] - 28:3, 51:15, 82:8 Alpharetta ^[1] - 22:20 alter ^[2] - 86:17, 100:5 amend ^[2] - 86:16, 100:5 amount ^[10] - 19:8, 30:10, 62:9, 97:14, 100:23, 101:1, 101:13, 104:18, 114:9, 114:18 angle ^[1] - 38:15 annexed ^[1] - 122:14 Annotated ^[1] - 121:7 answer ^[9] - 7:7,
\$125 ^[2] - 19:9, 43:23 \$13 ^[1] - 20:16 \$250 ^[1] - 49:3 \$30 ^[1] - 46:13 \$300 ^[1] - 86:5 \$400 ^[3] - 43:1, 43:6, 54:2 \$50 ^[3] - 48:23, 49:5, 54:4 \$500 ^[1] - 48:21 \$60 ^[1] - 86:14	2 2 ^[10] - 4:5, 18:1, 20:7, 20:12, 20:14, 74:22, 89:20, 89:21, 90:18, 121:5 20 ^[6] - 15:1, 71:23, 76:16, 86:2, 122:18 2001 ^[7] - 8:23, 13:15, 14:9, 15:22, 17:1, 17:12, 17:14 2002 ^[3] - 15:22, 17:1, 17:12 2003 ^[2] - 20:2, 75:20 2004 ^[2] - 14:14, 14:17 2005 ^[4] - 14:14, 14:17, 20:2, 23:24 2006 ^[5] - 37:4, 40:12, 50:6, 50:14, 50:15 2009 ^[3] - 24:5, 27:12, 35:22 2010 ^[2] - 28:7, 29:18 2011 ^[1] - 28:7 2013 ^[2] - 29:18, 42:5 2014 ^[16] - 4:7, 31:22, 31:23, 42:3, 47:3, 48:14, 88:21, 92:21, 95:15, 96:1, 98:22, 99:1, 100:13, 100:14, 100:15, 101:8 2015 ^[19] - 4:8, 31:22, 32:2, 32:13, 32:14, 42:1, 45:24, 46:19, 46:22, 88:21, 95:16, 95:17, 97:7, 97:17, 100:15, 100:19, 101:8, 101:14, 102:7 2016 ^[10] - 32:14, 32:21, 33:2, 33:4, 33:6, 41:19, 45:7, 100:20, 101:14 2017 ^[5] - 1:17, 119:22, 120:19, 120:23, 121:3 2105 ^[1] - 45:16 25 ^[1] - 47:12 26 ^[1] - 22:8	3 3 ^[6] - 4:7, 18:1, 54:2, 74:22, 95:1, 95:2 30 ^[4] - 15:2, 33:17, 105:6, 105:7 30(e) ^[1] - 121:6 300 ^[1] - 86:8 30032 ^[1] - 9:13 303013 ^[1] - 2:12 30303 ^[1] - 2:6 3100 ^[2] - 1:20, 2:5 35 ^[1] - 33:18 3841 ^[1] - 9:12 3:00 ^[1] - 62:14	8 8 ^[3] - 18:1, 84:15 86 ^[1] - 4:3 89 ^[1] - 4:5	9 9 ^[2] - 72:17, 72:18 9-11-28(c) ^[1] - 119:14 9-11-30(e) ^[1] - 121:7 95 ^[1] - 4:7 96 ^[1] - 4:8 98 ^[1] - 4:10
•	'04 ^[1] - 14:12 '05 ^[2] - 14:12, 19:22 '06 ^[2] - 19:22, 22:1 '07 ^[1] - 22:1 '15 ^[1] - 45:21 '16 ^[1] - 45:21 '94 ^[1] - 14:6 '97 ^[1] - 13:12 '98 ^[1] - 13:12 '99 ^[1] - 14:6 'till ^[1] - 37:4	4 4 ^[7] - 1:17, 4:8, 20:7, 20:11, 96:19, 96:20, 119:22 40 ^[11] - 69:19, 69:20, 69:21, 69:23, 70:11, 71:8, 71:9, 71:12, 71:13, 71:20 404-688-1210 ^[1] - 2:13 45 ^[1] - 104:23 4th ^[5] - 103:3, 103:4, 103:6, 120:19, 121:3	9 a.m ^[8] - 1:18, 20:8, 20:9, 20:11, 29:12, 29:13, 33:11, 33:12 AAA ^[23] - 33:20, 58:1, 63:8, 65:19, 68:4, 68:6, 75:3, 75:9, 107:18, 107:22, 107:25, 108:13, 108:14, 108:16, 108:17, 109:3, 109:7, 109:15, 109:17, 114:14, 115:9, 115:10, 115:11 abide ^[1] - 5:18 ability ^[1] - 6:14 AC ^[1] - 41:1 accept ^[2] - 67:23, 93:15 accepted ^[1] - 93:16 Access ^[9] - 27:13, 27:17, 27:23, 28:1, 28:20, 28:24, 29:14, 37:7, 94:3 accident ^[1] - 37:23 accidents ^[1] - 35:22 accomplish ^[1] - 59:6 accomplished ^[1] - 31:16 Accordingly ^[1] - 121:9 accounting ^[1] - 78:19 accounts ^[1] - 25:7 ACTIO ^[1] - 1:7 actual ^[1] - 106:20	A a
1	1 ^[13] - 4:3, 4:23, 16:7, 32:16, 32:19, 74:22, 86:20, 86:21, 90:11, 90:13, 90:15, 120:10, 121:4 10 ^[12] - 14:21, 16:7, 20:7, 20:12, 20:14, 38:11, 38:13, 39:19, 72:18, 74:22, 86:1, 115:1 10,000 ^[1] - 48:19 10.B ^[1] - 119:2 101 ^[2] - 1:20, 2:6 103 ^[1] - 3:4 107 ^[1] - 3:5 1099 ^[10] - 4:7, 4:8, 95:10, 95:15, 96:24, 97:1, 100:15, 100:20, 101:8, 101:14 1099s ^[2] - 97:8, 100:23 10:00 ^[1] - 1:18 11 ^[4] - 33:10, 37:6, 53:24 116 ^[2] - 3:6, 3:7 11th ^[1] - 15:10 12 ^[3] - 10:2, 10:5, 89:4 12-hour ^[1] - 88:22	5 5 ^[11] - 4:10, 4:23, 14:21, 18:1, 22:17, 22:23, 38:11, 86:1, 98:3, 98:5, 98:6 5/28 ^[1] - 92:19 50 ^[2] - 47:8, 47:9 55-minute ^[1] - 104:23	9 9 ^[2] - 72:17, 72:18 9-11-28(c) ^[1] - 119:14 9-11-30(e) ^[1] - 121:7 95 ^[1] - 4:7 96 ^[1] - 4:8 98 ^[1] - 4:10	A a
	6 6 ^[5] - 10:6, 18:1, 98:2, 98:20, 99:1 6/6/14 ^[1] - 87:23 6th ^[1] - 87:25	7 7 ^[7] - 3:3, 10:6, 20:7, 20:8, 20:9, 20:11		

<p>36:21, 40:21, 52:24, 55:13, 80:1, 92:6, 95:21, 109:20</p> <p>answer's [1] - 92:1</p> <p>answered [5] - 50:9, 79:23, 83:23, 83:24, 108:8</p> <p>answering [1] - 7:16</p> <p>answers [2] - 120:8, 121:2</p> <p>antique [1] - 26:23</p> <p>anyplace [1] - 52:20</p> <p>anyway [2] - 48:9, 71:4</p> <p>ap [2] - 70:23, 70:24</p> <p>APD [3] - 20:20, 22:17, 22:23</p> <p>APPEARANCES [1] - 2:1</p> <p>applicants [1] - 92:15</p> <p>Application [1] - 4:6</p> <p>application [7] - 6:2, 67:16, 67:17, 70:25, 71:1, 71:3, 94:15</p> <p>apply [3] - 91:3, 91:20, 92:11</p> <p>appointment [1] - 84:9</p> <p>approve [5] - 69:1, 69:2, 78:15, 116:18, 117:11</p> <p>approved [4] - 79:9, 79:10, 110:22, 112:14</p> <p>approving [1] - 78:25</p> <p>April [8] - 8:23, 31:24, 88:7, 88:8, 88:9, 88:12, 120:23</p> <p>area [13] - 10:8, 10:13, 22:14, 22:16, 22:24, 33:25, 44:17, 45:2, 48:7, 63:9, 66:15, 103:5, 105:3</p> <p>armed [1] - 19:20</p> <p>Arnold [1] - 30:20</p> <p>arrangements [1] - 119:5</p> <p>arrests [1] - 8:20</p> <p>arriving [2] - 21:16, 105:9</p> <p>Article [1] - 119:2</p> <p>assignments [1] - 107:1</p> <p>assist [1] - 121:9</p> <p>assistance [3] - 75:4, 75:14, 102:5</p> <p>assume [1] - 109:8</p> <p>assuming [1] - 53:16</p> <p>asthma [3] - 82:4, 82:7, 82:20</p>	<p>ATLANTA [1] - 1:2</p> <p>Atlanta [8] - 1:21, 2:6, 2:12, 10:8, 10:13, 22:24, 34:1, 44:19</p> <p>attached [2] - 4:23, 119:8</p> <p>attend [2] - 14:3, 14:10</p> <p>attorney [2] - 5:8, 8:9</p> <p>attorneys [1] - 8:17</p> <p>audio [2] - 65:12, 74:20</p> <p>August [1] - 103:5</p> <p>auto [3] - 16:24, 27:13, 35:22</p> <p>Auto [11] - 17:9, 17:13, 17:19, 27:17, 27:23, 28:1, 28:20, 28:24, 29:14, 37:7, 94:3</p> <p>automatic [1] - 105:7</p> <p>automotive [6] - 11:23, 12:15, 12:16, 12:17, 17:8, 30:25</p> <p>available [2] - 92:16, 92:22</p> <p>Avondale [3] - 12:3, 14:3, 14:4</p> <p>aware [3] - 89:13, 89:16, 89:18</p>	<p>54:15, 54:18, 56:10, 56:25, 58:18, 59:23, 63:21, 65:17, 66:1, 66:4, 67:1, 73:19, 75:5, 79:22, 80:24, 82:17, 83:22, 86:12, 87:21, 90:1, 90:6, 90:13, 91:6, 91:25, 92:5, 94:6, 97:24, 98:3, 103:10, 103:13, 107:13, 108:7, 110:6, 111:3, 113:16, 116:1, 116:3, 116:11, 116:13, 118:7</p> <p>Benjamin [5] - 2:5, 3:4, 3:6, 5:23, 107:9</p> <p>benjamin@dcbflegal.com [1] - 2:7</p> <p>best [1] - 45:8</p> <p>better [3] - 16:17, 29:15, 33:8</p> <p>Between [3] - 21:18, 35:4, 50:14</p> <p>between [19] - 34:3, 34:5, 34:16, 34:18, 34:20, 34:23, 35:2, 35:9, 35:10, 35:17, 50:6, 50:15, 62:11, 62:18, 88:21, 103:4, 104:19, 111:4, 118:13</p> <p>big [5] - 10:19, 44:23, 53:6, 83:9, 113:18</p> <p>bit [2] - 54:3, 71:14</p> <p>blank [1] - 36:8</p> <p>blue [2] - 42:10, 86:2</p> <p>BMW's [1] - 49:14</p> <p>Board [1] - 119:3</p> <p>boards [1] - 39:25</p> <p>bonus [1] - 69:17</p> <p>borderline [1] - 45:3</p> <p>borrowed [1] - 51:22</p> <p>boss [2] - 28:21, 28:23</p> <p>bottom [3] - 88:17, 90:22, 98:15</p> <p>box [4] - 73:21, 74:10, 84:12, 99:9</p> <p>brain [1] - 46:24</p> <p>brakes [7] - 11:22, 12:11, 12:13, 12:17, 31:7, 37:22, 41:1</p> <p>bravo [1] - 32:25</p> <p>Bravo [1] - 33:9</p> <p>break [5] - 7:17, 33:14, 52:5, 70:7, 82:12</p> <p>breakdowns [2] - 28:14, 34:7</p> <p>breakfast [1] - 58:8</p>	<p>breaks [2] - 113:8, 113:10</p> <p>BRIAN [2] - 1:4, 2:3</p> <p>Bridgers [1] - 2:5</p> <p>brief [1] - 6:9</p> <p>bring [7] - 20:20, 35:7, 44:11, 69:9, 99:16, 99:25, 108:2</p> <p>bringing [1] - 35:11</p> <p>broken [1] - 91:12</p> <p>brother [3] - 15:24, 16:9, 27:25</p> <p>brought [2] - 52:10, 74:6</p> <p>bulb [1] - 49:17</p> <p>bumper [1] - 39:15</p> <p>burger [1] - 113:12</p> <p>Burke [1] - 2:11</p> <p>BURNEY [2] - 1:4, 2:3</p> <p>business [13] - 24:7, 27:11, 27:22, 31:19, 36:3, 42:21, 69:4, 80:12, 80:20, 83:3, 94:11, 94:12, 95:19</p> <p>businesses [1] - 76:23</p> <p>busting [1] - 46:24</p> <p>busy [1] - 114:14</p> <p>BY [5] - 7:23, 103:13, 107:17, 116:3, 116:17</p>	<p>Carl [1] - 36:5</p> <p>CARLO [2] - 1:4, 2:3</p> <p>Carlton [5] - 4:4, 4:6, 4:7, 4:9, 5:6</p> <p>CARLON [7] - 1:5, 1:16, 2:3, 5:1, 121:1, 122:1, 122:17</p> <p>Carolina [4] - 56:2, 56:8, 56:14, 56:17</p> <p>Caron [2] - 10:2, 10:5</p> <p>carry [3] - 57:22, 58:3, 74:2</p> <p>cars [13] - 22:4, 39:11, 41:21, 45:18, 49:19, 53:7, 70:8, 70:11, 71:2, 71:8, 72:19, 80:21, 103:15</p> <p>cartoons [1] - 25:21</p> <p>case [7] - 5:20, 8:11, 119:16, 119:19, 120:15, 120:18</p> <p>cash [7] - 51:8, 51:13, 51:16, 69:6, 69:8, 75:17, 84:21</p> <p>cashier [1] - 14:19</p> <p>casing [1] - 21:3</p> <p>caught [1] - 75:23</p> <p>caused [4] - 82:10, 82:16, 82:18, 82:24</p> <p>CCR-2582 [3] - 1:22, 119:22, 120:22</p> <p>cell [4] - 61:12, 61:14, 93:24, 99:5</p> <p>Centennial [2] - 1:20, 2:5</p> <p>certain [2] - 30:3, 112:5</p> <p>certainly [2] - 91:15</p> <p>certificate [1] - 12:9</p> <p>certificates [4] - 11:17, 11:21, 13:21, 14:16</p> <p>certified [2] - 119:6, 119:6</p> <p>Certified [1] - 119:10</p> <p>certify [3] - 120:6, 120:13, 121:2</p> <p>chain [2] - 38:8, 39:1</p> <p>chains [2] - 38:22, 54:23</p> <p>chance [4] - 6:5, 58:9, 58:12, 112:8</p> <p>change [15] - 40:19, 48:7, 75:4, 75:7, 75:10, 82:11, 86:16, 103:1, 109:23, 110:1, 110:4, 110:10, 110:25, 112:1, 112:15</p> <p>changed [3] - 72:24, 93:23, 93:24</p>
	<p>B</p> <p>backed [1] - 34:7</p> <p>bank [1] - 59:9</p> <p>bar [1] - 39:14</p> <p>based [2] - 80:16, 100:9</p> <p>basis [1] - 6:18</p> <p>bathroom [1] - 60:8</p> <p>beacons [1] - 54:24</p> <p>bed [3] - 38:4, 38:6</p> <p>beep [2] - 115:17</p> <p>begin [3] - 7:8, 7:15, 90:10</p> <p>beginning [1] - 19:22</p> <p>behalf [3] - 2:2, 2:8, 68:13</p> <p>behind [1] - 57:5</p> <p>below [1] - 121:9</p> <p>BENJAMIN [72] - 2:4, 5:17, 5:22, 6:2, 6:7, 10:14, 12:25, 13:18, 13:20, 16:5, 21:15, 23:15, 24:14, 24:19, 27:5, 31:10, 33:13, 35:2, 36:19, 36:21, 37:19, 41:21, 47:14, 49:9, 50:8, 50:13, 52:3, 52:7, 52:19, 52:23, 53:10, 53:16,</p>		<p>C</p> <p>cable [4] - 38:22, 40:6, 72:5, 72:8</p> <p>Caldwell [1] - 2:5</p> <p>call's [1] - 115:11</p> <p>Camille [1] - 10:6</p> <p>campus [1] - 12:5</p> <p>Cannon [1] - 10:24</p> <p>caption [1] - 120:8</p> <p>car [30] - 28:14, 31:4, 35:14, 37:25, 38:2, 38:4, 38:5, 38:15, 38:17, 38:19, 39:2, 39:7, 39:14, 40:5, 40:8, 41:15, 41:23, 42:7, 43:2, 43:9, 45:19, 45:20, 49:12, 50:7, 50:12, 52:15, 52:17, 68:21, 113:17, 117:15</p> <p>car's [1] - 38:16</p> <p>card [2] - 69:7, 75:17</p> <p>cards [3] - 36:3, 51:9, 64:4</p> <p>care [1] - 65:22</p> <p>career [2] - 24:10, 27:4</p>	

<p>changes [4] - 48:10, 121:4, 121:5, 121:7</p> <p>channel [1] - 65:23</p> <p>charge [5] - 43:1, 49:5, 51:3, 51:6, 119:18</p> <p>charged [2] - 42:11, 43:22</p> <p>chase [1] - 20:19</p> <p>check [14] - 38:3, 38:4, 51:11, 53:1, 53:19, 54:3, 54:4, 54:5, 70:16, 80:9, 84:16, 84:23, 101:17, 109:13</p> <p>checks [3] - 78:2, 78:18, 84:18</p> <p>chicken [2] - 16:2, 76:11</p> <p>Chicken [2] - 76:13, 76:15</p> <p>child [2] - 81:25, 82:1</p> <p>children [1] - 10:1</p> <p>chirp [3] - 64:18, 64:19, 64:20</p> <p>choice [3] - 93:12, 93:14, 93:15</p> <p>Christmas [2] - 81:7, 102:7</p> <p>Civil [1] - 121:6</p> <p>CIVIL [1] - 1:7</p> <p>classes [3] - 12:11, 12:13, 12:18</p> <p>cleaning [1] - 84:16</p> <p>clear [6] - 8:14, 96:9, 100:25, 104:25, 107:2, 117:3</p> <p>clearance [1] - 52:13</p> <p>clerical [1] - 80:5</p> <p>client [1] - 6:5</p> <p>climate [2] - 11:22, 12:17</p> <p>clock [20] - 15:11, 15:16, 15:17, 16:18, 16:20, 18:7, 19:10, 20:21, 21:11, 21:19, 22:9, 22:12, 28:24, 29:8, 33:23, 62:13, 62:19, 62:21, 64:1</p> <p>close [4] - 16:8, 45:3, 63:9, 106:6</p> <p>closer [3] - 65:24, 66:8, 66:9</p> <p>clothes [1] - 60:16</p> <p>Code [1] - 121:6</p> <p>college [5] - 11:18, 17:7, 61:21, 61:24, 61:25</p> <p>College [4] - 11:25, 12:10, 13:19, 14:11</p>	<p>Colleges [1] - 22:25</p> <p>coming [3] - 65:10, 115:1, 117:14</p> <p>comments [1] - 36:10</p> <p>commercial [1] - 108:20</p> <p>commission [8] - 22:6, 28:9, 35:18, 35:20, 80:16, 100:9, 120:23, 122:20</p> <p>commission-based [1] - 80:16</p> <p>communication [1] - 107:21</p> <p>companies [2] - 28:15, 50:17</p> <p>company [24] - 18:18, 18:20, 23:6, 23:10, 31:18, 32:18, 32:24, 36:1, 51:3, 52:25, 53:25, 63:8, 68:15, 68:22, 70:17, 70:19, 72:10, 77:16, 77:19, 77:23, 77:25, 78:17, 78:21</p> <p>company's [3] - 36:14, 36:16, 36:17</p> <p>compared [1] - 115:1</p> <p>compensated [4] - 22:5, 28:8, 29:19, 33:16</p> <p>complain [3] - 100:14, 100:19, 100:22</p> <p>complete [3] - 94:22, 115:16, 120:11</p> <p>completed [1] - 107:1</p> <p>concluded [1] - 118:10</p> <p>concrete [1] - 18:14</p> <p>confirmed [1] - 93:10</p> <p>consider [5] - 15:3, 15:4, 24:9, 24:10, 51:24</p> <p>considered [1] - 111:24</p> <p>consist [1] - 37:11</p> <p>Construction [8] - 18:22, 19:24, 19:25, 23:13, 23:21, 23:23, 24:3, 24:4</p> <p>construction [1] - 18:14</p> <p>consuming [1] - 72:13</p> <p>contacted [1] - 119:12</p> <p>contract [2] - 86:25,</p>	<p>119:13</p> <p>contract/</p> <p>agreement [1] - 119:15</p> <p>Contracted [1] - 4:10</p> <p>contractor [1] - 100:9</p> <p>Contractor [1] - 4:4</p> <p>contractors [1] - 102:2</p> <p>contracts [2] - 22:21, 35:13</p> <p>control [4] - 11:22, 12:17, 80:11, 94:22</p> <p>conversation [2] - 7:3, 23:19</p> <p>convicted [1] - 9:3</p> <p>cook [3] - 14:19, 16:2, 16:3</p> <p>cool [1] - 34:12</p> <p>Copy [3] - 4:7, 4:8, 4:10</p> <p>correct [10] - 40:14, 40:15, 42:16, 79:15, 79:17, 92:10, 98:4, 100:5, 108:22, 120:12</p> <p>corrections [1] - 121:9</p> <p>cost [1] - 49:3</p> <p>Council [1] - 119:3</p> <p>COUNSEL [1] - 2:1</p> <p>counsel [5] - 118:13, 119:8, 119:16, 120:14, 120:16</p> <p>Counsel [1] - 89:23</p> <p>count [1] - 107:8</p> <p>Country [1] - 28:18</p> <p>County [2] - 9:8, 9:10</p> <p>COUNTY [1] - 120:4</p> <p>couple [12] - 25:21, 27:21, 33:17, 34:6, 34:17, 60:21, 61:1, 75:25, 76:1, 102:17, 103:11, 114:17</p> <p>course [12] - 13:4, 22:13, 25:4, 42:8, 42:9, 44:16, 62:8, 67:16, 74:3, 80:4, 102:11, 102:23</p> <p>court [8] - 89:25, 90:7, 90:8, 119:4, 119:6, 119:6, 119:12</p> <p>COURT [1] - 1:1</p> <p>Court [7] - 119:3, 119:10, 119:11, 119:13, 119:15, 119:18</p> <p>cousins [1] - 43:3</p> <p>cover [1] - 119:17</p> <p>crazy [1] - 112:3</p>	<p>credit [1] - 51:9</p> <p>Cross [1] - 28:17</p> <p>customary [1] - 119:19</p> <p>Customer [1] - 17:21</p> <p>customer [8] - 26:22, 51:14, 56:19, 56:23, 57:20, 72:1, 72:3, 72:20</p> <p>customers [3] - 20:18, 28:12, 57:22</p> <p>CVS [3] - 19:20, 20:4, 22:2</p>	<p>86:20, 89:20, 94:25, 96:18, 98:2</p> <p>Defendants [1] - 1:10</p> <p>defendants [1] - 5:9</p> <p>degrees [1] - 11:10</p> <p>DeKalb [9] - 9:8, 9:10, 11:25, 12:10, 13:16, 13:19, 14:10, 17:10, 18:12</p> <p>DeLong [1] - 2:5</p> <p>Dennis [10] - 10:23, 18:22, 18:23, 19:23, 19:25, 23:13, 23:21, 23:23, 24:2, 24:4</p> <p>Deo [1] - 76:18</p> <p>Deondre [1] - 76:18</p> <p>department [3] - 22:22, 55:6, 55:7</p> <p>Department [5] - 22:24, 23:1, 55:15, 55:17, 55:20</p> <p>departments [1] - 73:7</p> <p>DEPOSITION [3] - 1:15, 121:1, 122:1</p> <p>deposition [13] - 5:10, 6:22, 7:24, 8:4, 8:16, 118:15, 119:5, 119:7, 119:9, 119:12, 119:13, 119:17, 122:15</p> <p>deposition...with [1] - 121:8</p> <p>depositions [1] - 5:19</p> <p>describe [2] - 38:24, 68:21</p> <p>Description [1] - 4:2</p> <p>designated [7] - 22:14, 22:16, 33:25, 44:17, 45:2, 48:7, 66:15</p> <p>desire [1] - 121:7</p> <p>desired [1] - 93:2</p> <p>destination [1] - 63:3</p> <p>device [1] - 64:21</p> <p>devices [1] - 64:10</p> <p>died [1] - 82:8</p> <p>diesel [2] - 49:25, 50:2</p> <p>difference [5] - 35:17, 35:21, 43:12, 109:1, 114:25</p> <p>different [8] - 12:18, 18:1, 32:9, 37:17, 39:10, 73:7, 102:19, 102:21</p> <p>digital [1] - 64:20</p> <p>dinner [1] - 58:14</p> <p>diploma [7] - 11:13,</p>
---	--	---	---	---

11:14, 11:17, 11:24, 12:1, 12:2, 14:8 direction [1] - 120:10 directions [1] - 74:20 dis [1] - 109:3 disciplined [4] - 66:24, 71:13, 89:6, 89:11 DISCLOSURE [1] - 119:1 disclosure [2] - 119:4, 119:9 discount [1] - 119:19 discuss [2] - 93:7, 96:8 discussed [1] - 8:17 discussion [2] - 6:9, 93:6 dismissed [1] - 9:5 Dispatch [1] - 65:19 dispatch [16] - 22:19, 65:18, 65:21, 66:13, 107:23, 107:25, 108:13, 108:14, 108:15, 108:22, 108:24, 109:3, 109:6, 109:21, 113:19 dispatched [1] - 22:19 dispatcher [3] - 109:5, 109:11, 109:14 dispatchers [3] - 109:16, 109:17 dispute [8] - 92:10, 96:4, 96:15, 97:15, 97:22, 101:7, 101:8, 101:13 disputing [1] - 101:9 distress [2] - 50:24, 63:11 DISTRICT [2] - 1:1, 1:1 ditch [4] - 38:17, 38:19, 39:4, 39:6 division [3] - 11:23, 12:16, 12:18 DIVISION [1] - 1:2 doc [1] - 98:13 doctor's [1] - 84:9 document [10] - 4:10, 86:24, 87:17, 90:16, 91:13, 95:7, 95:9, 96:23, 98:9, 98:12 documents [1] - 8:5 dollar [1] - 70:15 dollars [3] - 29:24, 30:13, 54:5 done [8] - 40:9, 46:21, 50:16, 50:18,	53:7, 70:1, 82:8 door [1] - 61:8 DOT [5] - 54:25, 55:1, 55:2, 55:5, 58:5 doubt [1] - 36:13 down [35] - 6:24, 7:4, 7:10, 20:19, 25:21, 34:3, 34:10, 34:16, 38:4, 38:6, 38:16, 38:18, 39:25, 40:22, 44:19, 59:3, 63:12, 63:13, 70:7, 75:24, 75:25, 76:5, 77:4, 77:6, 77:11, 93:18, 114:10, 115:1, 116:5, 117:6, 117:14, 117:15, 117:21, 117:22, 120:7 downtown [2] - 22:17, 34:2 DPS [1] - 23:1 drive [10] - 22:13, 24:21, 30:17, 57:5, 60:1, 89:2, 108:19, 113:5 Driver [1] - 4:10 driver [15] - 24:12, 24:13, 36:5, 37:2, 54:10, 54:19, 54:21, 57:14, 57:18, 65:24, 76:20, 110:4, 110:17, 111:10, 112:6 driver's [2] - 75:18, 109:23 drivers [3] - 65:14, 85:22, 108:16 drives [1] - 112:6 drivethrough [1] - 14:19 driveway [2] - 27:16, 60:12 driving [9] - 25:4, 25:5, 27:15, 37:15, 37:16, 37:17, 37:24, 57:8, 89:3 drop [3] - 82:21, 83:2, 83:4 drum [1] - 31:7 dry [1] - 84:16 dryer [1] - 60:16 DS [1] - 64:19 dude [1] - 32:8 duly [1] - 5:2 during [10] - 13:8, 13:9, 21:20, 34:9, 44:14, 45:6, 83:6, 102:9, 103:20, 112:6 duties [8] - 14:18, 16:1, 17:23, 18:25, 20:17, 32:3, 33:19, 80:6	duty [1] - 103:20 E e-mailed [2] - 7:25, 8:1 early [4] - 62:21, 83:17, 95:15, 112:9 earn [1] - 69:10 earned [1] - 96:10 eat [7] - 42:19, 58:8, 60:9, 60:11, 60:12, 61:5, 104:5 eating [2] - 58:16, 58:21 eburke@ burkelawatl.com [1] - 2:13 Ed [1] - 27:25 edge [1] - 44:21 educational [1] - 11:10 effecting [1] - 121:9 efficiently [1] - 6:22 either [6] - 27:9, 49:15, 49:18, 71:4, 100:23, 101:9 electrical [2] - 11:22, 12:17 electronic [2] - 64:10, 64:23 emergencies [1] - 81:23 emergency [2] - 55:4, 81:3 employ [1] - 120:16 employed [1] - 101:24 employee [2] - 100:8, 100:11 employees [1] - 102:2 employer [3] - 58:18, 117:25, 119:7 employers [2] - 12:24, 13:3 employment [1] - 71:1 Employment [1] - 4:5 end [13] - 17:14, 28:6, 33:5, 35:3, 69:11, 81:15, 88:8, 88:12, 106:7, 106:8, 106:10, 107:5, 108:3 ended [4] - 106:6, 106:16, 106:21, 106:22 engines [1] - 50:3 ensure [1] - 58:5	enter [1] - 80:20 entered [1] - 121:8 entire [2] - 7:7, 7:15 entirety [1] - 8:15 entity [1] - 119:8 equipment [2] - 54:14, 54:22 Equipment [1] - 54:21 errand [2] - 58:24, 59:6 ESQ [2] - 2:4, 2:10 estimate [1] - 47:5 eventually [6] - 31:17, 54:2, 68:19, 77:13, 79:11, 80:18 everywhere [1] - 116:24 evidence [2] - 97:22, 120:12 exact [1] - 23:3 exactly [2] - 16:3, 23:25 Examination [6] - 3:2, 3:3, 3:4, 3:5, 3:6, 3:7 EXAMINATION [5] - 7:22, 103:12, 107:16, 116:2, 116:16 EXAMINATIONS [1] - 3:1 examined [1] - 5:2 example [2] - 86:7, 86:9 examples [1] - 31:6 except [1] - 35:10 exclusivity [1] - 88:18 excuse [1] - 71:21 Exhibit [16] - 4:2, 86:20, 86:21, 89:20, 89:21, 90:11, 90:13, 90:15, 90:18, 95:1, 95:2, 96:19, 96:20, 98:2, 98:5, 98:6 EXHIBITS [1] - 4:1 Exhibits [1] - 4:23 expect [1] - 66:3 experience [2] - 53:23, 66:10 expires [2] - 120:23, 122:20 explain [4] - 35:12, 40:1, 40:3, 71:14 Explain [1] - 37:21 extra [5] - 39:25, 44:8, 70:15, 71:9	F facebook [1] - 25:8 Facebook [2] - 25:24, 26:1 facts [1] - 8:11 failed [1] - 45:25 family [23] - 9:19, 10:7, 10:9, 10:11, 10:12, 27:21, 29:2, 41:6, 41:11, 42:18, 42:22, 43:13, 43:15, 43:17, 43:23, 44:4, 45:21, 82:9, 82:15, 83:9, 83:14, 83:18, 102:10 family's [1] - 10:19 far [6] - 10:25, 41:10, 46:7, 86:17, 104:15, 106:18 Farm [1] - 28:17 fast [1] - 113:12 father [1] - 23:21 favorite [1] - 61:23 February [1] - 32:2 Federal [1] - 121:6 federal [2] - 55:8, 55:12 feed [1] - 42:20 Ferarri [1] - 39:23 few [4] - 6:21, 34:17, 52:4, 77:14 fiance [1] - 9:23 fiance' [1] - 9:17 field [2] - 17:9, 22:3 fifteen [4] - 14:25, 15:1, 15:2, 15:6 fifth [1] - 92:15 fifty [2] - 18:6, 104:22 FILE [1] - 1:7 filed [1] - 90:8 fill [3] - 36:11, 67:4, 67:6 final [1] - 78:10 finalized [2] - 79:16, 79:17 financial [1] - 119:19 fine [8] - 8:13, 14:1, 23:4, 23:18, 71:18, 82:13, 95:23, 99:13 finish [10] - 7:7, 7:14, 23:16, 37:13, 38:2, 68:5, 106:20, 106:24, 107:3, 115:14 finished [2] - 106:7, 106:15 finisher [1] - 19:1 fire [1] - 70:9 fired [1] - 70:6
---	--	--	--	---

<p>first ^[14] - 5:2, 6:1, 11:4, 13:5, 18:12, 35:19, 39:5, 44:23, 45:9, 46:4, 55:14, 65:4, 76:17, 88:11</p> <p>Fitzpatrick ^[1] - 2:5</p> <p>Five ^[1] - 15:1</p> <p>five ^[8] - 15:2, 15:6, 30:12, 43:11, 47:10, 48:5, 85:18, 85:20</p> <p>fix ^[2] - 45:19, 45:20</p> <p>fixin' ^[1] - 78:21</p> <p>fixing ^[3] - 31:4, 41:1, 72:7</p> <p>flag ^[2] - 114:10, 117:20</p> <p>flagged ^[1] - 117:6</p> <p>flagging ^[1] - 116:4</p> <p>flags ^[1] - 117:21</p> <p>flashers ^[1] - 55:3</p> <p>flashlight ^[5] - 73:24, 74:2, 74:4, 74:10, 99:5</p> <p>flip ^[1] - 71:17</p> <p>Folks ^[4] - 15:20, 17:2, 17:5, 17:12</p> <p>folks ^[1] - 45:22</p> <p>follow ^[1] - 57:15</p> <p>following ^[3] - 57:12, 119:9, 121:5</p> <p>follows ^[1] - 5:3</p> <p>food ^[8] - 60:10, 60:23, 60:25, 61:3, 61:7, 103:25, 104:1, 113:12</p> <p>football ^[3] - 61:19, 61:21, 62:1</p> <p>FOR ^[1] - 1:1</p> <p>foregoing ^[2] - 120:6, 120:10</p> <p>form ^[23] - 5:25, 13:18, 24:14, 24:19, 27:5, 37:19, 49:9, 52:19, 52:23, 53:10, 56:25, 59:23, 65:17, 66:1, 67:14, 95:25, 97:24, 110:6, 113:16, 119:4, 119:8, 121:7, 121:9</p> <p>formal ^[1] - 5:14</p> <p>forward ^[1] - 112:19</p> <p>foundation ^[1] - 87:7</p> <p>four ^[2] - 9:15, 62:12</p> <p>frame ^[4] - 39:8, 39:9, 40:6, 104:23</p> <p>free ^[1] - 43:19</p> <p>freewill ^[1] - 15:14</p> <p>frequently ^[3] - 106:20, 106:24, 107:3</p> <p>fried ^[1] - 16:2</p> <p>friend ^[9] - 43:23,</p>	<p>45:8, 50:7, 50:12, 66:15, 76:7, 76:10, 93:19</p> <p>friends ^[9] - 24:17, 41:4, 41:11, 42:11, 43:13, 43:14, 43:16, 44:2, 50:19</p> <p>fry ^[2] - 16:2, 16:3</p> <p>full ^[4] - 5:5, 9:11, 11:17, 76:12</p> <p>Fulton ^[1] - 22:23</p> <p>FULTON ^[1] - 120:4</p> <p>function ^[1] - 68:1</p> <p>funny ^[1] - 57:11</p> <p>furnish ^[1] - 122:14</p> <p style="text-align: center;">G</p> <p>game ^[2] - 76:9, 76:25</p> <p>garage ^[1] - 47:22</p> <p>gasoline ^[2] - 49:25, 50:2</p> <p>GED ^[1] - 11:16</p> <p>general ^[4] - 52:22, 54:18, 54:20, 72:14</p> <p>generally ^[1] - 57:13</p> <p>generated ^[1] - 112:22</p> <p>geographic ^[1] - 105:2</p> <p>George ^[10] - 1:22, 6:23, 119:11, 119:11, 119:12, 119:15, 119:18, 119:22, 120:22, 121:3</p> <p>GEORGIA ^[2] - 1:1, 120:3</p> <p>Georgia ^[13] - 1:21, 2:6, 2:12, 9:8, 9:10, 9:12, 22:24, 55:9, 55:15, 55:17, 119:4, 119:10, 121:6</p> <p>girl ^[1] - 86:13</p> <p>given ^[5] - 5:14, 36:2, 119:20, 120:12, 121:2</p> <p>given...for ^[1] - 121:8</p> <p>Glover ^[3] - 27:19, 27:24, 27:25</p> <p>Glover's ^[1] - 94:9</p> <p>gloves ^[1] - 99:6</p> <p>Golf ^[1] - 32:17</p> <p>goodness ^[1] - 42:14</p> <p>goods ^[4] - 101:19, 101:20, 101:23, 102:2</p> <p>GPS ^[3] - 64:24, 74:11, 74:12</p> <p>grade ^[1] - 15:10</p> <p>graduate ^[3] - 13:13, 13:16, 13:23</p>	<p>graduated ^[2] - 13:21, 17:7</p> <p>graduating ^[1] - 17:6</p> <p>grand ^[1] - 23:20</p> <p>granddaddy ^[1] - 18:19</p> <p>grandfather ^[4] - 18:13, 20:3, 23:9, 23:11</p> <p>gratitude ^[1] - 85:3</p> <p>ground ^[3] - 6:21, 38:5, 39:22</p> <p>Group ^[1] - 2:11</p> <p>guess ^[33] - 26:24, 27:24, 31:18, 34:5, 34:12, 36:10, 36:18, 37:22, 45:3, 48:1, 51:23, 55:9, 61:10, 65:8, 68:6, 69:11, 70:1, 71:16, 75:11, 75:17, 76:18, 77:10, 79:11, 81:18, 84:16, 85:18, 91:5, 91:22, 92:3, 96:2, 99:16, 105:18, 115:22</p> <p>guy ^[1] - 112:7</p> <p>guys ^[1] - 73:14</p> <p style="text-align: center;">H</p> <p>hail ^[2] - 63:12, 63:13</p> <p>half ^[1] - 28:3</p> <p>Halls ^[1] - 10:24</p> <p>hand ^[1] - 79:2</p> <p>handle ^[2] - 78:19, 80:5</p> <p>handled ^[1] - 69:5</p> <p>handwriting ^[3] - 90:12, 90:16, 90:19</p> <p>happy ^[1] - 7:18</p> <p>hard ^[2] - 7:3, 7:10</p> <p>hate ^[1] - 31:7</p> <p>head ^[6] - 7:1, 7:2, 31:9, 40:23, 47:13, 79:6</p> <p>hear ^[4] - 43:1, 64:18, 66:9, 108:18</p> <p>heard ^[2] - 85:17, 105:21</p> <p>hearing ^[2] - 7:20, 120:13</p> <p>Hearse ^[1] - 10:22</p> <p>heart ^[1] - 42:14</p> <p>heater ^[1] - 41:2</p> <p>held ^[1] - 6:10</p> <p>help ^[8] - 6:21, 8:5, 20:3, 23:10, 72:1, 72:3, 72:22, 111:24</p> <p>helped ^[1] - 29:23</p> <p>helps ^[1] - 91:13</p>	<p>hereby ^[2] - 120:6, 121:2</p> <p>hi ^[1] - 109:2</p> <p>Hi ^[1] - 78:24</p> <p>high ^[12] - 11:14, 12:1, 13:5, 13:6, 13:8, 13:9, 13:13, 15:9, 17:6, 17:7, 85:18, 85:20</p> <p>High ^[3] - 12:3, 14:3, 14:4</p> <p>HILL ^[2] - 1:5, 2:3</p> <p>hire ^[1] - 25:1</p> <p>hired ^[13] - 78:7, 79:1, 79:5, 87:10, 87:14, 87:15, 87:16, 87:20, 88:3, 88:5, 88:7, 88:16</p> <p>hiring ^[1] - 77:1</p> <p>hit ^[3] - 105:22, 105:25, 115:16</p> <p>hold ^[5] - 8:2, 14:25, 19:19, 108:17, 114:15</p> <p>holes ^[2] - 39:8, 39:9</p> <p>holiday ^[2] - 81:10, 81:13</p> <p>holidays ^[2] - 81:5, 81:16</p> <p>home ^[15] - 41:12, 60:6, 60:9, 60:10, 60:17, 62:23, 74:6, 74:7, 75:22, 81:4, 82:21, 84:2, 84:3, 89:4, 108:5</p> <p>honest ^[1] - 25:18</p> <p>honestly ^[1] - 6:14</p> <p>hood ^[3] - 72:12, 72:15, 72:18</p> <p>hook ^[4] - 38:5, 39:7, 39:18, 40:6</p> <p>hooked ^[2] - 52:12, 52:14</p> <p>hooking ^[3] - 52:18, 53:8</p> <p>Hooks ^[1] - 38:22</p> <p>hooks ^[1] - 39:13</p> <p>hope ^[3] - 71:10, 72:21, 86:6</p> <p>hose ^[1] - 40:7</p> <p>hour ^[9] - 15:6, 16:12, 20:15, 20:16, 59:10, 108:3, 113:6, 115:19, 115:24</p> <p>hourly ^[7] - 14:22, 15:6, 18:3, 19:2, 20:4, 35:17, 67:12</p> <p>hours ^[10] - 14:20, 14:21, 16:4, 17:25, 18:1, 20:6, 29:10, 33:9, 44:7, 89:4</p> <p>house ^[4] - 10:3,</p>	<p>44:15, 45:2, 60:13</p> <p>huh-huh ^[1] - 82:25</p> <p>hundred ^[6] - 29:24, 30:13, 43:7, 43:10, 54:5</p> <p>hundreds ^[1] - 10:18</p> <p>hurry ^[1] - 84:2</p> <p style="text-align: center;">I</p> <p>I-20 ^[1] - 117:15</p> <p>ID ^[3] - 95:18, 95:19, 95:24</p> <p>IDEAL ^[2] - 1:8, 2:9</p> <p>Ideal ^[98] - 4:3, 4:5, 4:7, 4:8, 31:14, 31:20, 32:3, 32:10, 35:24, 36:2, 44:7, 44:18, 44:25, 47:25, 48:8, 48:11, 52:20, 53:7, 54:16, 56:4, 56:6, 56:18, 58:20, 59:19, 62:10, 63:21, 63:22, 64:1, 64:3, 64:14, 65:3, 65:21, 67:1, 67:2, 67:5, 67:15, 69:12, 72:2, 73:2, 73:5, 73:7, 73:9, 73:16, 73:19, 73:21, 75:5, 75:6, 75:7, 75:10, 76:6, 80:23, 82:18, 84:13, 84:18, 84:21, 84:22, 86:12, 86:13, 89:16, 91:4, 91:21, 92:11, 92:23, 95:14, 96:1, 97:4, 97:8, 97:12, 97:17, 101:3, 101:19, 101:24, 102:1, 102:4, 102:20, 103:14, 103:16, 103:17, 103:21, 104:9, 105:12, 106:5, 107:4, 107:18, 108:13, 108:15, 109:8, 109:9, 109:16, 112:19, 112:22, 113:1, 114:12, 116:6, 116:8, 116:18, 117:10</p> <p>ideal ^[5] - 63:23, 73:10, 73:20, 76:24, 109:17</p> <p>identification ^[5] - 86:22, 89:22, 95:3, 96:21, 98:7</p> <p>important ^[2] - 6:25, 47:19</p> <p>imposed ^[3] - 69:12, 70:17, 70:19</p> <p>impound ^[3] - 22:21, 35:11, 35:14</p>
---	--	---	--	--

<p>improperly ^[1] - 52:12</p> <p>IN ^[1] - 1:1</p> <p>incentive ^[4] - 71:11, 71:14, 71:16, 71:17</p> <p>increase ^[1] - 114:8</p> <p>increasing ^[1] - 104:7</p> <p>Independent ^[1] - 4:3</p> <p>INDEX ^[2] - 3:1, 4:1</p> <p>individual ^[7] - 43:22, 50:23, 63:10, 68:4, 86:3, 112:18, 117:20</p> <p>individuals ^[10] - 28:20, 41:8, 43:16, 50:21, 51:2, 75:3, 75:10, 114:10, 114:20, 117:5</p> <p>influence ^[2] - 6:13, 60:1</p> <p>information ^[3] - 36:12, 92:15, 112:19</p> <p>input ^[1] - 94:3</p> <p>inspection ^[1] - 55:3</p> <p>Instagram ^[1] - 25:11</p> <p>instance ^[4] - 57:18, 60:10, 61:12, 113:7</p> <p>instances ^[2] - 44:14, 71:25</p> <p>Institute ^[1] - 13:17</p> <p>insurance ^[2] - 28:14, 28:15</p> <p>interested ^[1] - 120:17</p> <p>interrupting ^[1] - 110:16</p> <p>interview ^[1] - 77:7</p> <p>introduce ^[2] - 109:7</p> <p>issues ^[2] - 83:14, 83:18</p> <p>itemization ^[2] - 96:7, 96:8</p>	<p>JAWANZA ^[2] - 1:4, 2:3</p> <p>jeopardy ^[2] - 88:25, 89:1</p> <p>job ^[51] - 13:1, 13:2, 13:5, 15:9, 15:18, 15:19, 16:17, 16:23, 18:16, 19:16, 19:18, 19:19, 21:23, 24:2, 24:5, 27:14, 31:13, 33:8, 35:23, 51:23, 52:1, 59:2, 62:25, 63:1, 65:18, 67:22, 67:24, 68:2, 69:1, 69:9, 79:14, 79:15, 80:17, 80:18, 89:7, 89:9, 89:11, 89:14, 89:15, 89:17, 93:16, 105:11, 106:1, 106:6, 112:18, 113:14, 113:20, 114:11, 115:3</p> <p>Jobs ^[1] - 32:16</p> <p>jobs ^[19] - 32:19, 34:4, 34:16, 34:20, 34:23, 35:2, 35:4, 35:9, 35:10, 62:14, 62:15, 62:16, 62:22, 63:6, 80:15, 80:19, 88:20, 114:9, 114:18</p> <p>John ^[1] - 30:20</p> <p>Johnson ^[1] - 9:24</p> <p>joint ^[1] - 113:12</p> <p>Jordan ^[2] - 5:8, 5:17</p> <p>JORDAN ^[1] - 2:10</p> <p>jordan.mahoney@burkelawatl.com ^[1] - 2:14</p> <p>Judicial ^[1] - 119:3</p> <p>July ^[3] - 103:3, 103:4, 103:6</p> <p>jump ^[10] - 32:5, 73:4, 73:5, 73:12, 73:21, 74:10, 75:4, 75:12, 84:12, 99:9</p> <p>jumped ^[1] - 17:8</p> <p>June ^[7] - 32:21, 33:4, 87:24, 88:14, 88:16, 98:20, 99:1</p> <p>jury ^[4] - 9:20, 9:22, 10:15, 10:18</p>	<p>kept ^[3] - 29:3, 44:14, 65:2</p> <p>kids ^[8] - 9:17, 10:2, 25:20, 42:20, 43:3, 81:3, 83:10, 102:12</p> <p>kin ^[1] - 120:14</p> <p>kind ^[6] - 28:12, 44:23, 50:24, 54:22, 110:9, 112:4</p> <p>kit ^[6] - 72:21, 72:23, 73:22, 74:11, 99:10, 99:12</p> <p>Kitchen ^[4] - 15:20, 17:3, 17:5, 17:12</p> <p>knock ^[2] - 83:11</p> <p>known ^[2] - 76:14, 76:15</p>	<p>69:23, 114:23, 115:6</p> <p>level ^[1] - 37:17</p> <p>Lewis ^[9] - 4:4, 4:6, 4:7, 4:9, 5:6, 10:2, 10:5, 10:6</p> <p>LEWIS ^[5] - 1:5, 1:16, 2:3, 5:1, 122:17</p> <p>lewis ^[2] - 6:11, 10:23</p> <p>LEWIS/LG ^[2] - 121:1, 122:1</p> <p>Lexus ^[1] - 49:16</p> <p>license ^[2] - 75:18, 76:1</p> <p>lie ^[2] - 96:16, 97:19</p> <p>life ^[1] - 84:1</p> <p>Light ^[1] - 33:21</p> <p>light ^[10] - 32:6, 32:8, 33:22, 49:17, 54:23, 73:8, 73:10, 73:13, 73:15</p> <p>lighting ^[1] - 47:19</p> <p>like.. ^[1] - 34:22</p> <p>limitation ^[1] - 105:3</p> <p>line ^[3] - 16:3, 92:15, 93:1</p> <p>Line ^[13] - 121:11, 121:13, 121:15, 121:17, 121:19, 121:21, 121:23, 122:2, 122:4, 122:6, 122:8, 122:10, 122:12</p> <p>LinkedIn ^[2] - 26:25, 27:1</p> <p>list ^[2] - 25:23, 94:14</p> <p>listed ^[2] - 97:14, 101:13</p> <p>listen ^[1] - 61:25</p> <p>Lithonia ^[2] - 44:20, 44:21</p> <p>litigation ^[2] - 119:8, 119:20</p> <p>live ^[2] - 23:2, 44:24</p> <p>lived ^[1] - 9:14</p> <p>livelihood ^[1] - 110:15</p> <p>lives ^[2] - 9:16, 10:8</p> <p>living ^[1] - 83:15</p> <p>LLC ^[7] - 1:8, 2:9, 2:11, 4:3, 4:5, 4:7, 4:9</p> <p>loading ^[1] - 38:1</p> <p>location ^[1] - 66:21</p> <p>locked ^[1] - 72:20</p> <p>lockout ^[6] - 73:22, 74:10, 75:4, 75:14, 99:10, 99:11</p> <p>lockouts ^[1] - 32:5</p> <p>log ^[7] - 64:5, 64:7, 64:8, 64:9, 64:10, 64:12, 115:14</p> <p>logs ^[1] - 64:6</p>	<p>loitering ^[2] - 8:25, 9:1</p> <p>look ^[16] - 26:2, 29:25, 30:15, 86:23, 90:11, 90:18, 90:21, 92:14, 93:1, 93:18, 93:25, 94:1, 95:4, 96:22, 98:8, 98:10</p> <p>looked ^[1] - 20:25</p> <p>looking ^[1] - 61:8</p> <p>lookup ^[1] - 17:21</p> <p>loose ^[2] - 72:6, 72:8</p> <p>Lopez ^[1] - 5:6</p> <p>love ^[3] - 24:8, 80:21</p> <p>low ^[2] - 39:22, 52:13</p> <p>lucky ^[4] - 34:6, 34:18, 58:9, 85:5</p> <p>lunch ^[11] - 19:15, 58:11, 60:9, 60:12, 60:19, 113:2, 113:3, 113:6, 113:8, 113:10, 113:11</p> <p>luxury ^[3] - 39:15, 39:17, 49:19</p>
<p>J</p>				<p>M</p>
<p>J&J ^[8] - 29:16, 29:17, 30:11, 31:15, 50:18, 51:5, 94:14, 94:17</p> <p>J-Hooks ^[1] - 38:22</p> <p>jack ^[6] - 72:25, 74:24, 75:1, 75:2, 99:19, 99:24</p> <p>James ^[8] - 2:17, 77:9, 77:12, 77:13, 87:19, 87:25, 93:8, 93:9</p> <p>JAMES ^[4] - 1:9, 1:9, 2:9, 2:9</p>				<p>mahoney ^[1] - 10:16</p> <p>MAHONEY ^[37] - 2:10, 5:4, 5:7, 5:13, 5:21, 5:23, 6:4, 6:11, 6:17, 6:20, 7:6, 7:13, 7:23, 13:24, 14:1, 23:18, 52:6, 52:21, 54:17, 81:1, 89:23, 90:14, 92:2, 92:6, 94:8, 98:4, 103:9, 107:6, 107:15, 107:17, 111:7, 115:25, 116:12, 116:15, 116:17, 118:6, 118:8</p> <p>Mahoney ^[59] - 3:3, 3:5, 3:7, 5:8, 13:2, 13:19, 14:2, 16:11, 21:18, 23:20, 24:16, 24:23, 27:9, 31:13, 33:16, 35:4, 36:24, 37:21, 41:23, 47:16, 49:11, 50:11, 50:14, 52:9, 53:2, 53:14, 53:20, 54:22, 56:15, 57:1, 58:20, 60:3, 63:22, 65:19, 66:3, 66:11, 67:2, 73:20, 75:9, 80:1, 81:5, 82:19, 84:5, 86:15, 86:23, 87:24, 90:10, 90:15, 91:11, 92:9, 94:9, 95:4, 96:22, 98:1, 98:8, 108:9,</p>

<p>110:9, 111:15, 113:22 maiden ^[1] - 10:23 mailed ^[2] - 7:25, 8:1 maintenance ^[22] - 41:2, 41:15, 41:19, 42:8, 42:22, 43:9, 43:24, 45:13, 45:16, 45:25, 46:18, 46:21, 47:3, 47:17, 47:20, 47:23, 48:14, 49:2, 49:8, 49:12, 49:21, 103:15 major ^[1] - 83:4 man ^[5] - 25:16, 26:22, 48:20, 74:16, 76:13 Man ^[10] - 27:7, 30:15, 43:6, 67:21, 71:8, 71:9, 71:23, 77:6, 112:4 management ^[3] - 110:20, 110:21, 110:24 manager ^[3] - 16:9, 27:17, 27:20 managers ^[1] - 27:21 Mandatory ^[1] - 4:10 mandatory ^[1] - 98:13 mar ^[1] - 31:24 March ^[2] - 88:8, 88:12 march ^[3] - 31:24, 32:14, 32:21 Marietta ^[2] - 1:20, 2:6 mark ^[2] - 86:19, 89:19 marked ^[8] - 86:21, 89:21, 94:25, 95:2, 96:18, 96:20, 98:1, 98:6 married ^[2] - 11:2, 78:18 Maserati ^[2] - 39:23, 49:13 matter ^[2] - 5:9, 9:22 maximum ^[1] - 30:10 McBrides ^[1] - 10:24 ME ^[2] - 64:13, 65:8 meal ^[1] - 104:5 mean ^[64] - 10:2, 13:4, 18:20, 21:15, 23:1, 24:15, 24:24, 27:1, 27:8, 30:22, 32:7, 36:20, 39:18, 39:20, 41:10, 42:20, 42:24, 46:18, 50:10, 53:18, 53:23, 57:8, 57:12, 59:24, 62:15, 63:13, 63:16, 68:17,</p>	<p>70:7, 70:14, 73:11, 73:25, 75:11, 78:1, 79:16, 80:17, 81:11, 81:25, 84:12, 85:17, 86:4, 86:5, 87:6, 87:9, 87:18, 88:24, 89:1, 89:8, 93:12, 93:15, 99:21, 99:23, 101:16, 105:1, 107:24, 110:7, 110:17, 111:1, 112:1, 112:21 meaning ^[1] - 93:5 meant ^[3] - 30:23, 111:10, 111:11 mechanic ^[5] - 31:2, 40:13, 40:25, 42:12, 45:5 media ^[5] - 24:16, 24:21, 25:7, 27:2, 27:7 medications ^[2] - 6:12, 6:18 medium ^[1] - 113:20 meet ^[8] - 70:7, 77:12, 77:13, 77:15, 77:22, 77:24, 78:4, 80:3 member ^[1] - 43:23 members ^[4] - 9:19, 10:7, 10:12, 58:2 mess ^[4] - 49:15, 49:18, 49:20, 78:21 messed ^[2] - 80:13, 80:19 met ^[5] - 78:5, 78:7, 78:22, 87:20, 87:25 metro ^[2] - 10:8, 10:13 MICHAEL ^[2] - 1:9, 2:9 Michael ^[5] - 77:9, 77:12, 77:13, 93:8, 93:9 microwave ^[1] - 60:20 Midtown ^[1] - 32:17 might ^[12] - 12:6, 25:20, 34:18, 41:11, 49:5, 60:25, 66:9, 114:16, 115:13, 115:15, 115:17, 119:17 Mike ^[12] - 77:15, 78:5, 78:8, 78:9, 78:22, 78:24, 79:15, 79:17, 80:11, 87:19, 87:25 mike ^[1] - 77:20 milestone ^[1] - 70:14 min ^[1] - 34:17 mine ^[1] - 99:16</p>	<p>mines ^[1] - 74:5 minutes ^[12] - 26:6, 34:6, 34:17, 38:12, 38:14, 39:19, 52:4, 60:21, 61:1, 104:23, 105:6, 105:7 miscalculate ^[1] - 37:24 miscommunication ^[1] - 111:4 miss ^[3] - 59:14, 84:6, 84:7 missed ^[2] - 31:5, 71:5 mission ^[1] - 31:16 MITCHELL ^[1] - 2:4 mom ^[5] - 33:8, 83:5, 83:15, 84:2, 84:3 mom's ^[2] - 10:19, 10:23 moment ^[5] - 6:8, 86:23, 95:4, 96:22, 98:8 money ^[16] - 21:2, 42:16, 48:13, 51:17, 53:2, 53:3, 53:9, 53:13, 53:15, 67:11, 71:9, 71:12, 76:5, 96:1, 101:1 month ^[4] - 31:23, 32:1, 46:14, 64:16 months ^[3] - 33:18, 42:9, 48:5 moon ^[1] - 86:2 morning ^[5] - 5:7, 6:15, 8:6, 21:8, 21:9 mornings ^[2] - 20:9, 112:9 most ^[10] - 29:3, 39:15, 43:8, 43:14, 44:11, 54:1, 66:7, 77:4, 86:10, 105:17 mostly ^[2] - 107:10 motorcycles ^[1] - 50:4 Mountain ^[1] - 23:3 mounted ^[1] - 64:24 move ^[1] - 15:24 MR ^[107] - 5:4, 5:7, 5:13, 5:17, 5:21, 5:22, 5:23, 6:2, 6:4, 6:7, 6:11, 6:17, 6:20, 7:6, 7:13, 7:23, 10:14, 12:25, 13:18, 13:20, 13:24, 14:1, 16:5, 21:15, 23:15, 23:18, 24:14, 24:19, 27:5, 31:10, 33:13, 35:2, 36:19, 36:21, 37:19, 41:21, 47:14, 49:9, 50:8, 50:13, 52:3,</p>	<p>52:6, 52:7, 52:19, 52:21, 52:23, 53:10, 53:16, 54:15, 54:17, 54:18, 56:10, 56:25, 58:18, 59:23, 63:21, 65:17, 66:1, 66:4, 67:1, 73:19, 75:5, 79:22, 80:24, 81:1, 82:17, 83:22, 86:12, 87:21, 89:23, 90:1, 90:6, 90:13, 90:14, 91:6, 91:25, 92:2, 92:5, 92:6, 94:6, 94:8, 97:24, 98:3, 98:4, 103:9, 103:10, 103:13, 107:6, 107:13, 107:15, 107:17, 108:7, 110:6, 111:3, 111:7, 113:16, 115:25, 116:1, 116:3, 116:11, 116:12, 116:13, 116:15, 116:17, 118:6, 118:7, 118:8 music ^[1] - 108:18 my.. ^[1] - 70:9</p>	<p>85:17, 96:6, 117:11 next ^[21] - 7:8, 15:19, 16:23, 18:15, 19:16, 19:18, 19:19, 21:23, 24:2, 24:5, 31:13, 34:13, 52:3, 58:6, 66:22, 77:14, 92:25, 94:1, 115:7, 115:11, 118:4 niece ^[2] - 29:23, 43:4 night ^[20] - 20:10, 21:10, 47:17, 73:25, 75:23, 102:24, 103:1, 103:7, 103:8, 109:24, 110:5, 111:14, 111:16, 111:17, 111:19, 111:21, 111:24, 112:2, 112:4, 112:9 nine ^[1] - 105:17 NO ^[1] - 1:8 nobody ^[5] - 21:3, 57:20, 70:7, 100:16, 116:22 nobody's ^[1] - 51:16 noes ^[1] - 7:1 noise ^[2] - 43:2, 43:5 non ^[3] - 68:4, 75:3, 75:9 none ^[2] - 81:22, 82:21 normal ^[1] - 23:19 normally ^[1] - 57:3 north ^[1] - 34:1 North ^[2] - 22:23, 56:17 northeast ^[2] - 34:1, 44:19 NORTHERN ^[1] - 1:1 Northlake ^[1] - 117:14 northwest ^[1] - 34:1 Notary ^[1] - 122:20 noted ^[2] - 121:4, 121:5 nothing ^[2] - 45:14, 49:2 notification ^[2] - 105:10, 105:25 notified ^[2] - 105:2, 105:19 notify ^[6] - 105:11, 109:21, 116:19, 116:20, 116:22, 116:23 November ^[3] - 32:13, 32:14, 33:6 number ^[20] - 36:14, 36:16, 47:6, 48:16, 48:17, 68:10, 68:12,</p>
N				
<p>n-u-r-s-e ^[1] - 46:11 N.W ^[1] - 2:6 Name ^[1] - 57:1 name ^[26] - 5:5, 5:7, 9:23, 10:10, 10:23, 18:18, 30:19, 31:6, 32:18, 36:4, 36:6, 36:8, 45:4, 45:9, 45:10, 45:15, 45:24, 46:10, 49:11, 67:8, 76:10, 76:12, 76:17, 87:2, 97:1, 98:15 names ^[7] - 9:18, 9:25, 10:21, 11:1, 11:4, 78:18 nap ^[1] - 59:13 napping ^[1] - 66:24 nay ^[1] - 68:24 necessary ^[1] - 122:14 need ^[13] - 7:17, 63:5, 68:14, 68:21, 72:24, 73:4, 73:5, 82:12, 89:4, 93:16, 110:10, 110:11, 111:2 needed ^[6] - 20:3, 23:10, 37:8, 59:9, 105:4, 105:25 needs ^[1] - 68:20 nephew ^[1] - 43:4 never ^[7] - 23:25, 46:7, 51:16, 68:15,</p>				

<p>69:18, 70:11, 90:4, 90:7, 93:22, 94:10, 94:12, 95:18, 95:19, 95:24, 95:25, 104:8, 105:8</p> <p>numeric [1] - 32:19</p> <p>numerous [1] - 107:7</p> <p>Nurse [1] - 46:9</p> <p>NW [1] - 2:11</p>	<p>81:3, 81:18, 81:22, 83:15, 89:9, 100:1, 101:10, 102:14, 107:11, 108:25, 110:4, 110:5, 114:25, 115:6, 115:18, 116:1, 116:12</p> <p>ones [2] - 11:3, 51:15</p> <p>online [1] - 27:4</p> <p>op [1] - 37:13</p> <p>open [5] - 12:5, 16:8, 93:5, 102:13</p> <p>Open [2] - 16:8, 93:5</p> <p>opened [1] - 102:15</p> <p>operate [1] - 30:18</p> <p>operating [4] - 32:4, 37:12, 37:14, 54:6</p> <p>operations [1] - 80:12</p> <p>opportunity [3] - 29:15, 33:8, 117:10</p> <p>option [3] - 67:23, 94:18, 94:20</p> <p>ordered [1] - 103:25</p> <p>original [2] - 4:24, 90:4</p> <p>outside [3] - 50:16, 63:7, 63:12</p> <p>ove [1] - 10:16</p> <p>oven [1] - 60:20</p> <p>overstep [1] - 109:18</p> <p>own [18] - 18:19, 24:1, 41:15, 41:16, 41:22, 41:24, 42:7, 43:9, 51:18, 74:12, 75:1, 75:2, 84:11, 99:3, 99:14, 99:24, 100:11, 102:15</p> <p>owned [7] - 18:19, 23:13, 23:21, 27:23, 28:25, 29:1, 51:18</p> <p>owner [8] - 30:9, 69:24, 77:16, 77:18, 77:25, 78:17, 78:23, 78:24</p> <p>owners [1] - 77:22</p>	<p>121:19, 121:21, 121:23, 122:2, 122:4, 122:6, 122:8, 122:10, 122:12</p> <p>pages [2] - 120:10, 122:14</p> <p>paid [27] - 14:22, 16:11, 18:3, 19:6, 20:15, 29:20, 29:21, 30:13, 35:17, 35:18, 35:19, 43:8, 43:12, 45:15, 46:2, 48:13, 51:1, 53:11, 53:25, 54:5, 67:12, 72:9, 84:18, 84:21, 85:25, 101:17, 115:3</p> <p>Paige [1] - 27:22</p> <p>park [5] - 34:9, 34:13, 34:20, 34:22, 44:15</p> <p>parking [2] - 34:25, 35:5</p> <p>part [5] - 22:3, 65:22, 87:6, 111:24, 121:7</p> <p>parties [5] - 118:13, 119:8, 119:19, 120:15, 120:16</p> <p>parts [2] - 17:21, 17:22</p> <p>party [4] - 11:7, 119:7, 119:15, 119:20</p> <p>passed [1] - 33:8</p> <p>past [3] - 12:24, 25:15, 27:15</p> <p>Patrol [1] - 22:24</p> <p>paul [1] - 46:9</p> <p>pay [18] - 42:25, 43:6, 45:12, 45:18, 45:25, 46:2, 46:3, 46:4, 46:5, 46:8, 46:12, 51:7, 52:18, 75:16, 80:16, 84:11, 84:14, 87:2</p> <p>paying [1] - 84:17</p> <p>payment [2] - 69:5, 75:24</p> <p>pays [1] - 53:1</p> <p>people [4] - 7:10, 45:18, 46:19, 47:2</p> <p>people's [2] - 45:18, 45:20</p> <p>per [4] - 20:15, 48:25, 49:1, 86:3</p> <p>percent [3] - 22:8, 28:11, 33:17</p> <p>percentage [1] - 69:10</p> <p>perfectly [1] - 95:23</p> <p>perform [8] - 37:8, 46:18, 47:16, 49:8, 49:12, 69:13, 113:15,</p>	<p>113:18</p> <p>performed [7] - 41:3, 44:1, 45:4, 45:25, 47:3, 114:9, 114:19</p> <p>performing [4] - 42:12, 43:9, 62:25, 63:1</p> <p>period [1] - 57:8</p> <p>permission [3] - 44:12, 59:1, 108:11</p> <p>permitted [2] - 21:13, 22:11</p> <p>person [4] - 48:25, 49:1, 68:17, 116:4</p> <p>personal [5] - 36:12, 74:8, 99:1, 99:18, 99:25</p> <p>Peters [1] - 2:11</p> <p>phone [15] - 36:14, 36:16, 61:12, 61:15, 64:15, 68:18, 68:19, 68:20, 93:22, 93:25, 94:10, 94:12, 99:5, 108:20, 109:20</p> <p>pick [3] - 63:4, 63:5, 63:6</p> <p>picked [1] - 48:2</p> <p>pickup [1] - 49:24</p> <p>picture [2] - 26:18, 26:24</p> <p>pictures [3] - 26:7, 26:8, 26:13</p> <p>place [2] - 21:3, 39:9</p> <p>plaintiff [1] - 1:6</p> <p>Plaintiff [1] - 2:2</p> <p>plan [1] - 13:25</p> <p>play [2] - 51:16, 82:7</p> <p>playing [2] - 62:4, 62:5</p> <p>plugs [1] - 49:6</p> <p>plus [2] - 22:21, 44:8</p> <p>point [2] - 40:14, 117:13</p> <p>police [4] - 22:21, 22:22, 35:13, 35:14</p> <p>Police [1] - 22:23</p> <p>Porter [2] - 27:22</p> <p>possession [3] - 97:22, 99:1, 99:2</p> <p>possibility [1] - 66:2</p> <p>possible [3] - 40:8, 92:25, 112:11</p> <p>pouring [1] - 18:14</p> <p>power [2] - 38:23, 79:12</p> <p>praying [1] - 60:25</p> <p>precinct [1] - 22:17</p> <p>predicament [1] - 112:25</p> <p>prefer [1] - 74:14</p> <p>preferred [2] - 74:18,</p>	<p>74:19</p> <p>premises [2] - 20:19, 22:12</p> <p>preparation [2] - 95:20, 98:14</p> <p>present [4] - 50:6, 50:14, 79:7, 79:20</p> <p>Present [1] - 2:16</p> <p>presents [3] - 102:13, 102:16, 102:18</p> <p>pretrip [1] - 54:11</p> <p>prevent [1] - 9:21</p> <p>prevented [4] - 72:11, 88:20, 89:13, 89:17</p> <p>pri [1] - 114:21</p> <p>price [1] - 68:25</p> <p>priority [1] - 115:10</p> <p>prison [1] - 60:2</p> <p>private [8] - 18:20, 28:19, 28:25, 29:1, 114:19, 114:25, 115:23, 116:4</p> <p>privates [2] - 114:15, 114:24</p> <p>privilege [1] - 6:3</p> <p>privileged [1] - 8:18</p> <p>problem [1] - 109:22</p> <p>Procedure [1] - 121:6</p> <p>proceeding [1] - 5:15</p> <p>proceedings [1] - 118:10</p> <p>process [10] - 38:1, 38:10, 38:24, 39:3, 40:1, 40:3, 40:4, 40:9, 40:10, 68:5</p> <p>professional [1] - 12:20</p> <p>profile [3] - 26:7, 26:8, 26:25</p> <p>profiles [1] - 27:4</p> <p>program [1] - 12:19</p> <p>prohibited [2] - 72:15, 119:14</p> <p>prom [1] - 15:9</p> <p>promise [1] - 46:25</p> <p>proof [1] - 101:16</p> <p>propounded [1] - 121:2</p> <p>protect [1] - 20:18</p> <p>protocols [2] - 56:22, 57:7</p> <p>provide [4] - 30:1, 102:4, 119:12, 119:15</p> <p>Public [4] - 23:1, 55:15, 55:18, 122:20</p> <p>pull [10] - 38:7, 39:2, 39:3, 39:8, 40:5, 40:7,</p>
O				
<p>O.C.G.A [1] - 119:14</p> <p>object [3] - 24:14, 24:19, 52:23</p> <p>objection [21] - 13:18, 27:5, 37:19, 49:9, 50:8, 50:13, 52:19, 53:10, 53:16, 56:25, 59:23, 65:17, 66:1, 66:4, 79:22, 83:22, 97:24, 107:6, 108:7, 110:6, 113:16</p> <p>objections [1] - 5:24</p> <p>obligations [3] - 82:10, 82:15, 82:23</p> <p>occasionally [2] - 62:2, 62:4</p> <p>occupancy [1] - 57:17</p> <p>occupants [1] - 57:2</p> <p>occupation [2] - 24:9, 25:23</p> <p>occur [2] - 9:7, 52:10</p> <p>occurred [2] - 46:14, 46:16</p> <p>OF [7] - 1:1, 1:15, 2:1, 120:3, 120:4, 121:1, 122:1</p> <p>offer [3] - 12:11, 12:13, 16:17</p> <p>office [4] - 65:20, 69:6, 80:6, 109:20</p> <p>Official [1] - 121:6</p> <p>often [4] - 85:1, 109:23, 110:1, 111:8</p> <p>oil [1] - 40:19</p> <p>older [1] - 112:7</p> <p>on-call [1] - 83:7</p> <p>On-the [1] - 13:2</p> <p>once [10] - 16:20, 29:7, 53:24, 56:12, 56:13, 56:14, 85:6, 85:10, 105:19, 110:5</p> <p>One [1] - 85:21</p> <p>one [30] - 8:21, 11:19, 12:18, 32:19, 40:8, 48:1, 50:16, 57:3, 66:9, 68:20, 74:14, 77:5, 77:16,</p>	P			
<p>p.m [11] - 20:8, 20:11, 20:13, 20:14, 29:12, 29:13, 33:11, 33:12, 118:11</p> <p>package [2] - 67:19, 67:21</p> <p>page [4] - 88:17, 90:21, 94:1, 110:3</p> <p>Page [15] - 3:2, 4:2, 121:11, 121:13, 121:15, 121:17,</p>				

<p>43:1, 60:15, 66:20, 117:16 pulling [3] - 17:22, 39:5, 72:9 punch [10] - 15:11, 16:18, 18:7, 19:10, 20:21, 22:9, 28:24, 29:8, 33:23, 64:1 punched [4] - 15:16, 15:17, 16:20, 22:12 purchase [1] - 99:7 purpose [1] - 9:20 Pursuant [2] - 119:2, 121:6 put [16] - 24:25, 34:13, 38:5, 38:6, 38:7, 43:20, 49:6, 67:8, 77:3, 77:8, 94:17, 105:5, 105:7, 112:24, 113:12 putting [1] - 88:24</p> <p>Q</p> <p>quarter [1] - 106:11 questions [7] - 103:9, 107:14, 115:25, 116:11, 118:6, 120:8, 121:2 quick [4] - 43:20, 49:2, 113:12 quickly [2] - 105:3, 105:24 quota [5] - 69:12, 70:2, 70:4, 70:14, 71:15</p>	<p>17:9, 54:25, 55:1, 58:5, 60:4, 60:24, 107:11 real [1] - 43:20 really [8] - 30:17, 34:19, 39:21, 49:2, 59:4, 73:11, 100:6, 104:21 reason [10] - 15:8, 16:16, 35:24, 76:24, 83:21, 92:10, 96:4, 96:15, 97:15, 108:6 reasonable [1] - 70:12 reasons [1] - 121:8 receive [11] - 11:24, 12:8, 12:23, 14:7, 14:15, 17:17, 84:24, 85:6, 95:15, 97:8, 113:14 received [17] - 11:11, 87:13, 88:2, 88:4, 96:1, 96:5, 96:11, 96:13, 97:2, 97:15, 100:15, 100:20, 101:2, 104:11, 104:13, 106:6, 113:1 receiving [2] - 104:19, 105:25 Recess [1] - 52:8 recharge [1] - 41:1 recognize [7] - 86:24, 87:1, 87:6, 95:7, 96:23, 96:25, 98:9 recollection [1] - 91:14 record [7] - 5:5, 6:8, 6:10, 85:23, 91:12, 98:5, 111:3 record's [1] - 92:2 recross [1] - 107:15 redacted [2] - 89:24, 89:25 redirect [1] - 116:14 reduced [1] - 120:9 references [1] - 93:19 referral [2] - 119:7, 119:17 refresh [1] - 91:13 regular [5] - 7:3, 37:17, 37:25, 49:24, 120:15 regularly [1] - 109:15 regulation [1] - 57:17 Regulations [1] - 119:3 reinstated [1] - 76:4 reiterate [1] - 91:11</p>	<p>relate [1] - 56:22 relates [1] - 57:18 relation [1] - 9:21 release [1] - 39:1 remain [3] - 59:16, 59:25, 60:3 remember [7] - 11:3, 16:5, 16:15, 46:22, 47:2, 64:25, 78:13 remind [1] - 109:18 rented [1] - 51:20 repairs [1] - 103:15 repeats [1] - 25:20 rephrase [1] - 117:4 report [2] - 85:13, 85:16 reporter [5] - 89:25, 119:4, 119:6, 119:6, 119:16 Reporter [1] - 119:10 reporter's [1] - 119:7 Reporting [6] - 119:3, 119:11, 119:13, 119:15, 119:18 reporting [4] - 119:5, 119:12, 119:15, 119:16 represent [1] - 120:11 representative [2] - 95:25, 119:11 request [7] - 7:13, 68:4, 75:3, 75:10, 81:10, 81:11, 81:13 require [2] - 37:16, 38:21 required [5] - 34:25, 73:18, 81:24, 103:21, 104:19 requirement [1] - 105:24 reserve [2] - 5:24, 6:7 reserved [1] - 118:15 reside [1] - 9:9 residence [1] - 9:16 respective [1] - 118:13 respond [4] - 59:22, 104:20, 105:4, 105:20 response [2] - 31:11, 47:14 responses [2] - 6:25, 7:4 responsibility [1] - 110:10 responsible [1] - 53:22 responsiveness [1] - 5:25</p>	<p>restaurant [1] - 103:25 restrictions [1] - 113:23 restroom [1] - 52:4 result [1] - 120:18 retain [1] - 51:13 return [1] - 34:25 returning [1] - 63:11 review [1] - 8:5 ride [4] - 30:21, 57:5, 58:2, 94:23 riding [5] - 41:12, 43:4, 56:23, 58:2, 66:19 risk [1] - 54:6 Road [1] - 9:12 road [2] - 37:12, 115:10 roadside [8] - 22:21, 28:14, 32:4, 32:5, 33:20, 37:14, 102:5, 115:10 Robert [3] - 27:19, 27:24, 94:9 roll [2] - 38:18, 40:7 rollover [5] - 39:3, 40:3, 40:4, 40:9, 40:10 room [1] - 58:4 rope [1] - 39:2 roughly [1] - 43:10 routine [4] - 20:23, 41:2, 42:8, 54:9 row [1] - 94:17 rule [12] - 58:16, 58:21, 58:24, 59:3, 61:9, 61:14, 66:14, 72:7, 72:11, 72:14, 89:13, 89:16 Rule [1] - 121:6 Rules [2] - 119:2, 121:6 rules [1] - 6:21 run [3] - 31:17, 42:20, 67:10 running [2] - 58:24, 114:25 rush [1] - 118:4</p> <p>S</p> <p>safe [1] - 39:20 Safety [3] - 23:1, 55:16, 55:18 safety [3] - 38:8, 56:22, 57:6 salary [2] - 93:2, 93:8 sale [1] - 25:1 sandwich [1] - 60:14</p>	<p>Saturday [1] - 112:9 saw [2] - 50:23, 116:4 say-sos [1] - 78:10 saying.. [1] - 57:11 scenario [1] - 40:5 schedule [3] - 82:11, 112:3, 112:15 scheduled [4] - 80:25, 81:6, 81:8, 81:21 school [14] - 11:14, 12:1, 12:2, 12:25, 13:5, 13:6, 13:8, 13:9, 13:13, 14:21, 15:9, 17:6, 17:7, 19:17 School [3] - 12:3, 14:3, 14:4 scope [2] - 40:5, 116:14 screaming [1] - 115:1 screw [1] - 39:14 seat [1] - 72:19 seatbelts [1] - 57:4 seats [2] - 57:24, 58:1 second [5] - 12:6, 17:15, 48:3, 48:4, 90:21 security [5] - 19:20, 32:18, 90:3, 90:7 Security [1] - 32:16 see [19] - 25:4, 25:5, 55:15, 55:17, 55:20, 63:10, 70:15, 71:8, 74:1, 74:17, 80:10, 88:17, 91:8, 92:15, 93:2, 94:3, 102:1, 109:13, 109:22 selected [3] - 65:14, 65:25, 66:6 sell [3] - 101:19, 101:20, 101:23 selling [1] - 102:2 send [3] - 73:1, 75:24, 105:18 sent [1] - 73:2 seriously [1] - 10:19 serve [1] - 28:12 service [11] - 17:21, 32:6, 32:8, 33:21, 68:8, 73:8, 73:10, 73:13, 73:15, 105:7 serviced [1] - 36:6 services [12] - 37:9, 41:4, 42:12, 43:11, 44:1, 45:5, 102:4, 102:5, 102:6, 119:6, 119:12, 119:15 servicing [1] - 28:16</p>
<p>R</p> <p>R' [1] - 32:11 radio [2] - 62:1 raise [1] - 33:17 ramp [1] - 40:2 Ransom [1] - 93:19 Ranson [2] - 45:8, 45:9 rare [1] - 107:24 rate [1] - 14:24 rates [1] - 119:19 rather [2] - 7:1, 100:8 reach [2] - 69:16, 70:15 read [16] - 118:7, 121:2, 121:7, 121:11, 121:13, 121:15, 121:17, 121:19, 121:21, 121:23, 122:2, 122:4, 122:6, 122:8, 122:10, 122:12 ready [8] - 17:7,</p>				

<p>seven [5] - 14:25, 29:11, 62:18, 106:11</p> <p>Seven [1] - 18:6</p> <p>shade [1] - 34:11</p> <p>Shakaria [1] - 10:5</p> <p>shaking [2] - 7:1, 40:23</p> <p>shall [3] - 119:4, 119:8, 121:8</p> <p>sheets [4] - 64:3, 64:8, 64:9, 67:5</p> <p>Sheila [1] - 9:24</p> <p>shift [48] - 21:20, 44:10, 60:5, 83:12, 102:19, 102:21, 102:24, 103:2, 103:7, 103:20, 104:12, 104:14, 106:6, 106:7, 106:8, 106:10, 106:16, 106:21, 106:22, 107:4, 108:3, 108:9, 109:24, 109:25, 110:10, 110:11, 110:25, 111:13, 111:14, 111:16, 111:17, 111:19, 111:20, 111:21, 111:25, 112:1, 112:2, 112:4, 112:7, 112:10</p> <p>shifts [7] - 88:23, 109:23, 110:4, 110:18, 111:5, 111:8</p> <p>shook [1] - 79:2</p> <p>shop [3] - 42:25, 44:3, 44:5</p> <p>shoplifters [1] - 20:19</p> <p>short [2] - 33:14, 52:4</p> <p>show [5] - 19:12, 30:24, 31:3, 92:3, 105:6</p> <p>showed [1] - 31:1</p> <p>sick [6] - 23:9, 81:2, 81:4, 81:17, 81:22, 81:25</p> <p>side [1] - 32:9</p> <p>sign [7] - 21:4, 67:14, 78:18, 87:12, 87:16, 98:11, 118:7</p> <p>signature [4] - 6:6, 90:22, 98:17, 118:14</p> <p>signed [2] - 4:4, 4:6</p> <p>signing [1] - 78:2</p> <p>sit [3] - 25:21, 97:21, 108:18</p> <p>site [1] - 19:14</p> <p>sitting [5] - 38:15, 39:7, 61:10, 82:5, 116:25</p>	<p>situation [2] - 38:11, 39:12</p> <p>six [2] - 30:12, 48:5</p> <p>skill [1] - 37:17</p> <p>skills [6] - 37:8, 37:11, 40:11, 40:13, 40:16, 40:25</p> <p>slash [2] - 12:5</p> <p>sleep [2] - 34:12, 44:16</p> <p>slow [1] - 114:16</p> <p>smash [1] - 60:14</p> <p>SMITH [2] - 1:4, 2:3</p> <p>smooth [1] - 21:1</p> <p>smoothly [1] - 6:22</p> <p>snapchat [1] - 25:13</p> <p>sneak [1] - 113:10</p> <p>sober [4] - 59:16, 59:21, 59:25, 60:4</p> <p>social [7] - 24:16, 24:20, 25:7, 27:2, 27:7, 90:3, 90:7</p> <p>soft [1] - 105:16</p> <p>softly [1] - 7:21</p> <p>software [1] - 105:16</p> <p>sold [2] - 31:17, 31:18</p> <p>sole [1] - 9:19</p> <p>someone [6] - 45:4, 45:15, 46:2, 46:4, 46:8, 46:22</p> <p>sometime [2] - 31:24, 52:3</p> <p>sometimes [12] - 20:10, 39:17, 41:11, 52:9, 56:21, 57:5, 63:6, 66:9, 102:24, 109:18, 109:20, 112:23</p> <p>somewhere [4] - 22:19, 59:3, 88:11, 103:3</p> <p>son [4] - 26:12, 82:4, 82:8, 82:19</p> <p>soon [7] - 76:5, 92:24, 105:10, 106:2, 115:16</p> <p>sorry [18] - 8:12, 10:20, 12:2, 12:5, 14:14, 15:1, 16:3, 23:14, 23:17, 30:22, 31:12, 37:13, 40:20, 57:10, 91:25, 99:12, 110:14, 110:16</p> <p>sort [1] - 65:1</p> <p>sos [1] - 78:10</p> <p>sound [1] - 65:12</p> <p>sounding [1] - 91:12</p> <p>sounds [2] - 71:11, 78:11</p> <p>source [1] - 119:7</p>	<p>South [4] - 22:23, 56:2, 56:8, 56:13</p> <p>Southern [4] - 15:20, 17:3, 17:5, 17:12</p> <p>space [2] - 36:8, 36:11</p> <p>spark [1] - 49:6</p> <p>speaking [3] - 7:20, 52:20, 108:12</p> <p>spec [1] - 91:23</p> <p>specific [3] - 73:18, 94:16, 104:18</p> <p>Specifically [1] - 117:8</p> <p>specifically [2] - 53:21, 117:20</p> <p>specifics [1] - 8:16</p> <p>speculate [4] - 36:19, 55:10, 78:14, 91:13</p> <p>speculating [1] - 16:6</p> <p>speculation [1] - 66:5</p> <p>speeding [1] - 75:24</p> <p>spell [1] - 46:10</p> <p>spend [1] - 102:10</p> <p>split [1] - 51:15</p> <p>sports [1] - 61:17</p> <p>spot [2] - 36:5, 66:22</p> <p>stand [1] - 55:5</p> <p>STANLEY [2] - 1:5, 2:3</p> <p>start [14] - 17:13, 27:11, 31:23, 38:2, 39:5, 58:7, 68:5, 69:22, 69:24, 73:4, 73:5, 75:4, 75:12, 92:23</p> <p>started [13] - 13:8, 18:13, 24:4, 29:15, 32:13, 32:16, 33:3, 35:16, 35:22, 37:4, 37:7, 100:13, 102:25</p> <p>starts [1] - 44:10</p> <p>state [12] - 5:4, 55:7, 55:9, 55:12, 55:14, 55:16, 55:24, 56:7, 56:20, 91:14, 91:15</p> <p>State [2] - 22:24, 28:17</p> <p>STATE [1] - 120:3</p> <p>statement [1] - 121:8</p> <p>states [1] - 119:4</p> <p>STATES [1] - 1:1</p> <p>stating [1] - 119:5</p> <p>stay [6] - 10:3, 28:1, 45:22, 102:11, 111:23, 114:2</p> <p>stayed [2] - 24:4, 44:9</p>	<p>step [3] - 29:23, 34:24, 74:22</p> <p>steps [1] - 40:9</p> <p>still [3] - 30:13, 93:22, 94:13</p> <p>still.. [1] - 92:1</p> <p>stipulated [1] - 118:12</p> <p>stipulations [1] - 5:18</p> <p>stone [1] - 23:3</p> <p>stop [13] - 7:8, 58:10, 58:12, 59:9, 59:11, 63:14, 63:17, 66:19, 113:3, 116:23, 117:2, 117:16, 117:24</p> <p>stopped [6] - 17:16, 27:15, 44:22, 63:18, 102:11, 116:10</p> <p>stopping [1] - 118:5</p> <p>store [1] - 74:7</p> <p>straight [1] - 38:16</p> <p>strap [1] - 38:6</p> <p>straps [1] - 54:23</p> <p>street [1] - 43:21</p> <p>Street [3] - 1:20, 2:6, 2:11</p> <p>stretch [1] - 34:24</p> <p>stuck [1] - 107:12</p> <p>stuff [3] - 11:2, 25:17, 98:10</p> <p>subscribed [1] - 122:18</p> <p>substance [1] - 121:7</p> <p>substances [1] - 6:13</p> <p>Suite [1] - 2:12</p> <p>Summerhouse [1] - 10:24</p> <p>Sunday [1] - 48:2</p> <p>supervisor [4] - 21:7, 21:12, 71:7, 85:22</p> <p>supplemental [1] - 122:14</p> <p>supplies [1] - 19:15</p> <p>supposed [6] - 21:2, 46:6, 67:4, 106:10, 107:4, 108:19</p> <p>surroundings [1] - 38:3</p> <p>suspend [1] - 76:1</p> <p>suspended [1] - 75:19</p> <p>swapping [2] - 111:5, 111:9</p> <p>switch [5] - 80:15, 110:18, 110:23, 111:8, 111:16</p> <p>switched [2] - 36:1,</p>	<p>111:15</p> <p>switching [1] - 111:5</p> <p>Sworn [1] - 122:18</p> <p>sworn [1] - 5:2</p> <p>system [3] - 64:23, 105:16, 115:17</p> <p style="text-align: center;">T</p> <p>tablet [10] - 60:24, 64:13, 65:16, 67:23, 68:1, 74:15, 74:19, 74:21, 105:22, 107:20</p> <p>tablets [1] - 65:6</p> <p>talkie [3] - 64:22, 65:2, 65:7</p> <p>tax [3] - 95:18, 95:20, 95:24</p> <p>teaching [1] - 30:17</p> <p>team [1] - 61:23</p> <p>Tech [2] - 17:10, 18:12</p> <p>Technical [5] - 11:25, 12:10, 13:17, 13:19, 14:11</p> <p>teenager [1] - 40:17</p> <p>tender [1] - 119:4</p> <p>Tennessee [2] - 56:3, 56:15</p> <p>testified [3] - 5:3, 17:11, 70:10</p> <p>testify [1] - 6:14</p> <p>testimony [5] - 5:14, 86:17, 88:2, 88:4, 100:5</p> <p>text [1] - 115:16</p> <p>THE [50] - 1:1, 1:1, 5:6, 5:12, 5:16, 6:16, 6:19, 7:5, 7:12, 13:22, 13:25, 16:7, 23:17, 24:15, 24:20, 27:6, 31:12, 33:15, 36:20, 36:23, 37:20, 47:15, 49:10, 50:10, 52:25, 53:11, 53:18, 54:20, 56:11, 59:24, 65:18, 66:2, 66:7, 75:6, 79:24, 81:2, 83:24, 86:13, 87:23, 90:5, 90:9, 91:7, 92:7, 94:7, 97:25, 107:7, 110:7, 111:6, 111:12, 113:17</p> <p>theft [1] - 20:19</p> <p>their.. [1] - 109:19</p> <p>theirs [1] - 36:4</p> <p>themselves [2] - 109:7, 109:8</p> <p>thereto [1] - 120:9</p> <p>thousand [4] - 17:14, 24:5, 28:6, 32:13</p> <p>threatening [1] -</p>
--	--	--	--	--

<p>84:1 three ^[10] - 9:17, 16:8, 26:5, 42:9, 62:19, 92:13, 93:23, 94:17 throw ^[5] - 30:16, 39:25, 42:13, 42:15, 60:16 Thursday ^[1] - 48:1 tight ^[1] - 38:7 tip ^[8] - 42:17, 42:19, 42:22, 42:24, 85:18, 86:5, 86:8, 86:14 tipped ^[1] - 86:10 tips ^[5] - 84:24, 85:6, 85:13, 85:23, 85:25 tire ^[4] - 72:24, 75:3, 75:7, 75:10 Tishja ^[11] - 2:17, 77:20, 78:4, 78:10, 78:15, 78:16, 79:9, 79:20, 80:5, 87:19 TISHJA ^[2] - 1:9, 2:9 tishja ^[1] - 79:7 titled ^[1] - 4:10 TO ^[2] - 3:1, 4:1 today ^[3] - 53:21, 85:18, 97:21 together ^[1] - 43:20 toll ^[1] - 86:5 took ^[6] - 45:17, 51:16, 53:19, 90:3, 113:4, 113:24 tool ^[2] - 98:13 tools ^[7] - 38:21, 73:18, 74:8, 84:11, 84:12, 98:25, 99:8 Tools ^[1] - 4:10 Top ^[1] - 32:17 total ^[3] - 37:3, 48:25, 71:23 touch ^[2] - 45:22, 49:13 TOW ^[1] - 37:2 tow ^[55] - 19:19, 24:6, 24:21, 26:18, 26:19, 27:11, 27:15, 32:4, 34:4, 34:23, 37:8, 37:16, 38:2, 39:13, 39:14, 39:18, 44:1, 46:18, 50:22, 51:2, 51:18, 51:20, 51:22, 51:25, 52:10, 53:8, 54:7, 54:10, 54:19, 54:20, 56:6, 57:14, 57:18, 58:2, 62:3, 62:16, 62:25, 63:1, 68:5, 68:8, 68:14, 68:20, 71:2, 73:11, 73:13, 76:20, 76:22, 80:20, 105:11,</p>	<p>112:18, 114:9, 114:11 Tow ^[17] - 21:24, 22:3, 22:5, 22:20, 23:7, 24:11, 24:13, 27:20, 28:22, 29:4, 29:5, 34:14, 34:20, 34:23, 35:16, 35:19, 112:19 Tow's ^[1] - 35:6 towed ^[6] - 50:7, 50:11, 50:12, 55:23, 70:8, 70:11 Tower ^[2] - 1:20, 2:5 Towing ^[49] - 4:3, 4:5, 4:7, 4:9, 27:18, 27:23, 28:2, 29:16, 31:14, 31:21, 32:3, 32:10, 33:9, 35:25, 36:2, 44:7, 44:18, 44:25, 47:25, 48:8, 48:11, 58:21, 59:19, 62:10, 64:14, 69:12, 76:6, 84:19, 84:22, 89:16, 91:4, 91:21, 92:11, 92:23, 94:4, 95:14, 96:1, 97:4, 97:9, 97:12, 97:17, 101:19, 101:24, 102:1, 102:4, 102:20, 103:14, 106:5 TOWING ^[2] - 1:8, 2:9 towing ^[17] - 24:5, 24:8, 26:14, 26:15, 26:23, 32:23, 33:21, 33:22, 72:1, 73:8, 73:9, 76:9, 76:24, 80:21, 102:5, 106:1, 106:6 tows ^[7] - 30:11, 50:16, 62:9, 64:8, 64:9, 69:13, 69:20 toys ^[1] - 32:11 traffic ^[1] - 106:18 training ^[5] - 12:21, 12:23, 12:25, 13:2, 17:17 transcript ^[4] - 4:24, 119:9, 120:7, 120:12 Transportation ^[2] - 55:6, 55:21 transportation ^[1] - 55:8 transported ^[1] - 21:2 travel ^[1] - 56:19 tree ^[1] - 34:11 trial ^[1] - 9:22 triangles ^[1] - 55:4 trick ^[2] - 46:25, 87:4 tried ^[1] - 114:20</p>	<p>trouble ^[3] - 7:20, 71:20, 80:14 truck ^[67] - 22:13, 24:22, 25:4, 25:5, 26:18, 26:19, 26:20, 29:3, 29:5, 30:1, 30:9, 30:18, 31:17, 32:4, 34:9, 34:21, 34:22, 35:8, 37:2, 37:9, 37:12, 37:14, 37:16, 37:18, 38:2, 38:23, 39:18, 40:7, 44:6, 44:9, 44:15, 49:21, 49:23, 49:24, 51:18, 51:20, 51:22, 51:25, 52:11, 53:8, 54:7, 54:11, 54:19, 54:21, 60:1, 60:11, 62:3, 64:21, 64:24, 68:11, 68:12, 72:25, 73:11, 76:20, 76:22, 99:15, 100:2, 104:15, 104:17, 105:9, 108:2, 108:5, 112:6, 113:20, 113:23, 113:24 trucks ^[1] - 27:15 true ^[4] - 61:13, 101:6, 114:8, 120:11 trunk ^[1] - 72:19 truth ^[1] - 25:16 truthfully ^[1] - 6:15 try ^[7] - 7:6, 10:17, 15:24, 70:14, 108:16, 109:18 trying ^[7] - 30:16, 42:21, 46:25, 57:10, 87:4, 89:8, 108:18 tune ^[2] - 41:1, 49:5 turn ^[2] - 74:22 turns ^[1] - 37:24 TV ^[4] - 25:17, 25:19, 61:6, 61:11 twenty ^[1] - 43:10 twice ^[3] - 29:7, 53:24, 56:13 Twitter ^[1] - 25:9 two ^[21] - 7:10, 16:8, 17:14, 22:20, 24:5, 26:6, 28:3, 28:6, 32:13, 57:3, 57:22, 58:2, 62:11, 62:14, 62:15, 62:16, 71:22, 81:18, 81:22, 90:11 type ^[3] - 49:11, 64:5, 64:23 types ^[4] - 7:4, 39:10, 43:2, 49:7 typewriting ^[2] - 120:9, 122:14 typically ^[1] - 6:17</p>	<p>U</p> <p>uncle ^[1] - 40:18 under ^[11] - 6:12, 34:11, 60:1, 72:12, 72:15, 72:18, 72:19, 92:15, 119:13, 120:9 uniform ^[3] - 26:14, 26:15, 84:14 UNITED ^[1] - 1:1 University ^[1] - 22:25 unless ^[5] - 43:19, 49:17, 62:23, 67:10, 82:25 unlock ^[2] - 72:21, 72:23 up ^[38] - 19:12, 34:7, 34:11, 38:5, 38:6, 38:16, 39:7, 39:18, 40:4, 40:5, 43:1, 49:5, 52:14, 52:18, 53:8, 57:22, 60:19, 60:23, 61:3, 61:7, 63:4, 63:5, 63:6, 69:19, 72:9, 72:18, 72:19, 73:25, 80:13, 81:15, 105:17, 112:22, 114:12, 114:15, 116:6, 116:8 upgraded ^[1] - 65:6 ups ^[1] - 41:1 upside ^[1] - 38:17 USAA ^[1] - 28:18 usual ^[1] - 119:19</p> <p>V</p> <p>vacation ^[1] - 75:22 valentine ^[1] - 81:14 Valentine ^[1] - 81:15 varied ^[2] - 18:2, 20:9 varies ^[1] - 34:8 vary ^[1] - 62:11 vehicle ^[8] - 40:6, 55:23, 56:6, 57:2, 72:1, 72:12, 72:15, 108:20 vehicles ^[5] - 39:10, 39:16, 39:17, 49:7, 52:10 verbal ^[3] - 31:11, 40:21, 47:14 verbalize ^[1] - 6:25 version ^[2] - 89:24 versus ^[4] - 43:13, 71:12, 73:8, 108:13 vest ^[1] - 99:6 view ^[1] - 38:3 visiting ^[1] - 66:14 vocational ^[1] -</p>	<p>12:21 vs ^[1] - 1:7</p> <p>W</p> <p>wage ^[10] - 15:3, 15:4, 15:5, 15:7, 18:5, 19:6, 29:21, 29:22, 80:15, 80:18 wait ^[1] - 115:6 waiting ^[15] - 58:17, 58:22, 58:25, 59:18, 60:7, 60:13, 60:22, 61:3, 61:6, 61:15, 61:16, 62:6, 66:16, 66:21, 66:25 walkie ^[3] - 64:22, 65:2, 65:7 walkie-talkie ^[3] - 64:22, 65:2, 65:7 warehouse ^[1] - 17:21 warm ^[3] - 60:19, 61:3, 61:7 warming ^[1] - 60:23 watch ^[6] - 20:18, 25:17, 25:19, 25:21, 61:6, 61:11 watched ^[1] - 102:17 wave ^[1] - 63:15 wearing ^[2] - 26:13, 26:15 website ^[1] - 27:2 week ^[21] - 8:2, 8:3, 41:18, 54:4, 69:11, 69:15, 69:16, 69:20, 71:10, 77:14, 84:16, 85:7, 85:9, 85:11, 87:20, 88:3, 88:4, 88:5, 104:9, 110:5 weekends ^[1] - 112:8 weeks ^[2] - 26:2, 85:8 Whiteheads ^[1] - 10:24 whole ^[5] - 10:9, 10:11, 62:18, 84:6, 84:7 winch ^[3] - 39:2, 39:8, 40:6 winching ^[1] - 38:20 window ^[1] - 104:24 Wing ^[3] - 76:11, 76:13, 76:15 winners ^[2] - 13:10, 14:18 wire ^[1] - 72:5 withstand ^[1] - 57:3 Witness ^[3] - 31:9, 47:13, 79:6 WITNESS ^[48] - 5:6,</p>
--	---	--	--	---

5:12, 5:16, 6:16, 6:19,
 7:5, 7:12, 13:22,
 13:25, 16:7, 23:17,
 24:15, 24:20, 27:6,
 31:12, 33:15, 36:20,
 36:23, 37:20, 47:15,
 49:10, 50:10, 52:25,
 53:11, 53:18, 54:20,
 56:11, 59:24, 65:18,
 66:2, 66:7, 75:6,
 79:24, 81:2, 83:24,
 86:13, 87:23, 90:5,
 90:9, 91:7, 92:7, 94:7,
 97:25, 107:7, 110:7,
 111:6, 111:12, 113:17
witness ^[4] - 5:14,
 5:25, 118:14, 118:15
word ^[2] - 77:3, 77:8
worry ^[1] - 25:17
wreck ^[1] - 74:18
wrench ^[1] - 99:14
write ^[4] - 36:7,
 90:24, 91:17, 98:23
written ^[3] - 59:3,
 70:3, 92:18
WYNN ^[2] - 1:4, 2:3

Y

yard ^[1] - 44:11
year ^[13] - 14:7,
 14:13, 14:15, 28:3,
 28:5, 33:5, 42:9,
 81:15, 92:20, 96:5,
 97:6, 98:21, 100:12
years ^[18] - 9:15,
 13:11, 14:2, 14:10,
 15:2, 28:4, 29:17,
 31:20, 33:1, 37:5,
 46:23, 53:24, 76:16,
 91:8, 92:13, 93:23,
 97:11
yeses ^[1] - 7:1
yourself ^[5] - 24:11,
 26:11, 88:23, 88:25,
 112:25

Z

Zone ^[5] - 16:24,
 17:9, 17:13, 17:19,
 22:23
zone ^[18] - 22:17,
 54:12, 58:7, 59:5,
 59:7, 59:11, 62:24,
 63:4, 63:7, 63:11,
 63:12, 69:4, 102:11,
 114:2, 114:4, 114:5
zoned ^[1] - 44:9